



Development
Services Agency

Amended Program Year 2020 - 2024 Ohio Consolidated Plan

April 2021

The approved PY2020-2024 has been amended with the correct PY2020 HOME and CDBG allocation amounts

Prepared By:
Ohio Development Services Agency
Community Services Division
Office of Community Development

Mike DeWine, Governor of Ohio
Jon Husted, Lt. Governor
Lydia Mihalik, Director

The Process

PR-05 Lead & Responsible Agencies 24 CFR 91.300(b)

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	OHIO	Ohio Development Services Agency
HOPWA Administrator	OHIO	Ohio Development Services Agency
HOME Administrator	OHIO	Ohio Development Services Agency
ESG Administrator	OHIO	Ohio Development Services Agency
NHTF	OHIO	Ohio Development Services Agency

Responsible Agencies Table

Narrative

The Draft PY 2020-2024 Ohio Consolidated Plan along with the PY 2020 Annual Action Plan can be viewed on Development’s website at https://development.ohio.gov/cs/cs_ocp.htm. Hard copies of the plan can be requested at the address listed below or from the email address conplan@development.ohio.gov. The lead agency responsible for developing the Consolidated Plan is the Office of Community Development (OCD) within the Ohio Development Services Agency (Development). The Ohio Housing Finance Agency (OHFA), which is responsible for awarding a portion of the Home Investment Partnerships (HOME) Program funds for housing development projects, also works closely with OCD staff in preparing the Consolidated Plan. OHFA also serves as the state subrecipient of the National Housing Trust Fund.

Consolidated Plan Public Contact Information:

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Columbus, Ohio 43215

PR-10 Consultation - 91.110, 91.300(b); 91.315(l)

Introduction

In preparing the PY 2020 – 2024 State of Ohio’s Consolidated Plan, Development consulted with stakeholders, other agencies, and members of the general public. Consulting with organizations and members of the public allowed Development to gain as much information as possible regarding housing, community and economic development conditions and homelessness in the state of Ohio. The citizen participation process, which provides the list of public participation opportunities with dates and locations included, is outlined at https://development.ohio.gov/cs/cs_ocp.htm.

Through the Community Housing Impact and Preservation Program, Community Development/Economic Development, Supportive Housing/Homelessness, Fair Housing, Housing Opportunities for Persons With AIDS (HOPWA) and the Housing Development Assistance Program Advisory Committee (PAC) meetings held in early November 2019, conference calls, online participation as part of the Needs Assessment Surveys and through public hearings, OCD gained much insight on statewide needs. OCD distributed all notifications electronically, through direct mailings and media advisories, to comply with both state and federal regulations. The results and questions asked on the Needs Assessment Surveys will be discussed as part of the Needs Assessment section as this element of the plan was critical in determining statewide needs.

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

A number of housing, health, mental health, and service organizations and agencies participated in the PY 2020 – 2024 Consolidated Plan planning process to enhance coordination and provide meaningful feedback. The following list includes the agencies and actions taken to enhance coordination as part of the planning process:

- Representatives from the Ohio Department of Mental Health and Addiction Services (OhioMHAS) and Ohio Department of Developmental Disabilities (ODODD) helped review the Homeless Crisis Response Program, Supportive Housing Program, and balance of state Continuum of Care applications in addition to serving on the Program Advisory Committees. OhioMHAS also assisted in marketing and providing technical assistance to any of the OCD/ OhioMHAS-affiliated organizations. Representatives also advise OHFA on providing rental housing and necessary services for its population.
- OCD coordinated its lead-based paint activities with the Ohio Department of Health (ODH), which included training, housing and policy development.
- OCD's fair housing coordinator worked with the Ohio Civil Rights Commission to address issues of mutual concern relative to civil rights and fair housing.
- OCD coordinated with the Ohio Historic Preservation Office staff in addressing historic preservation issues that arise relative to housing, economic, and community development projects, as well as providing training on preservation issues and procedures.
- OCD worked with OHFA in administering HOME and OHTF multifamily housing projects.
- OCD participated in the Ohio Emergency Management Agency’s (OEMA) Advisory Committee that specifically examines OEMA’s Emergency Operations Plan.

It should be noted that in Ohio, statewide agencies do not administer public housing authorities (PHAs) as local housing authorities administer units in Ohio.

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

A Continuum of Care (CoC) is a geographically based group of representatives that carry out the planning responsibilities of the U.S. Department of Housing and Urban Development’s (HUD) CoC Homeless Assistance Program. These representatives come from organizations that provide services to people experiencing homelessness. The map included below shows how the Ohio Balance of State Continuum of Care (BoSCoC), representing the 80 non-urban counties in Ohio, is divided into 17 distinct regions.

Development's Office of Community Development and the Coalition on Homelessness and Housing in Ohio (COHHIO) serve as the lead staffing agencies and co-chairs of the Steering Committee for the Ohio BoSCoC. Development serves as the Ohio BoSCoC Collaborative Applicant (submits the annual consolidated CoC Application) while COHHIO serves as the HMIS Lead Agency.

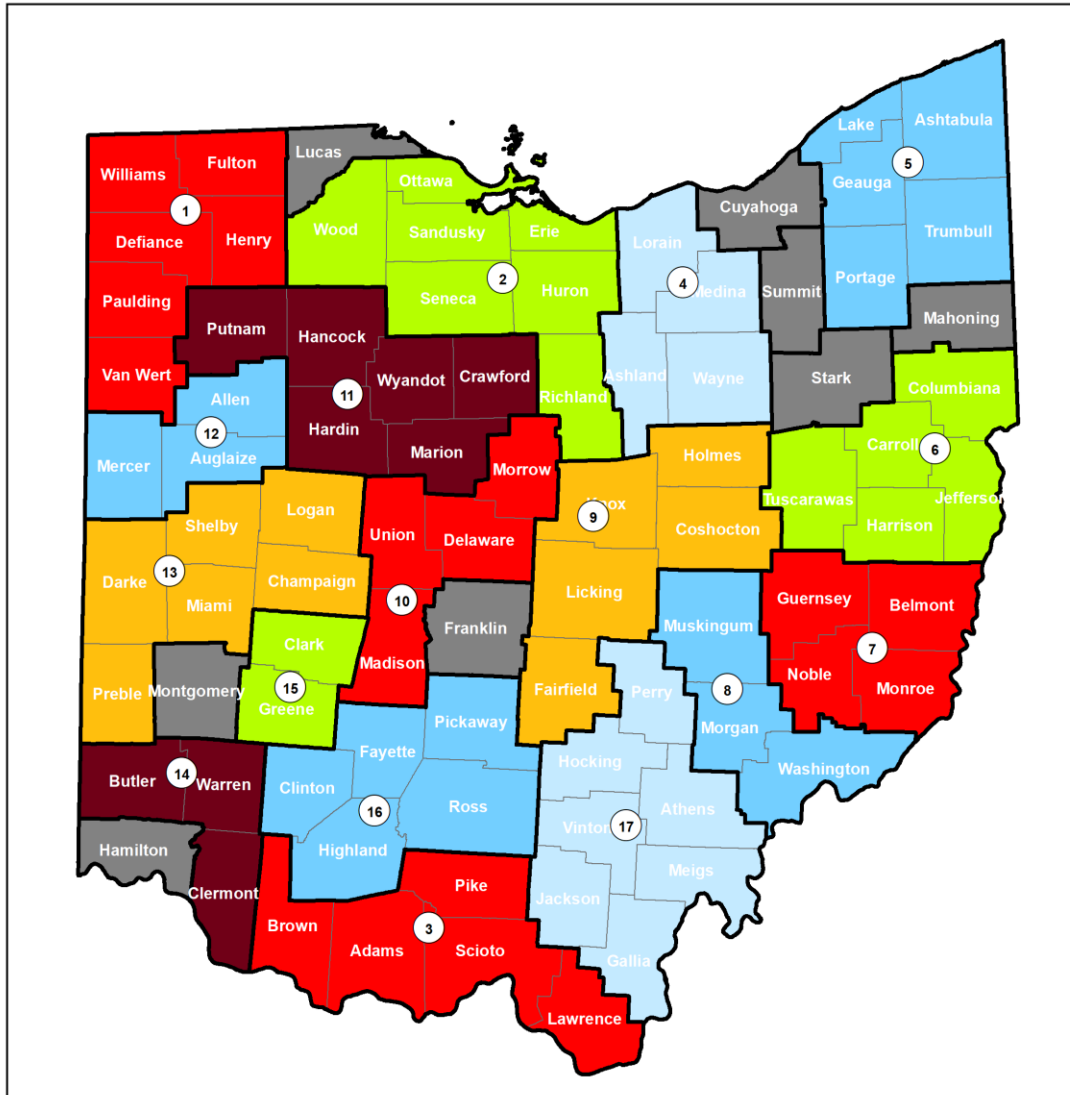
Efforts include Coordinated Entry, data collection and coordination with various service providers that provide emergency shelter, rapid re-housing and permanent supportive housing services to clients. Coordinated Entry (CE) increases the homeless assistance system's efficiency by standardizing access to homeless services and coordinating program referrals.

The Ohio BoSCoC is committed to sustaining a CE system that will help to advance the goals of helping households quickly access appropriate services to address housing crises, increasing exits to housing, decreasing length of time homeless, and reducing returns to homelessness.

Ohio Balance of State Continuum of Care (BoSCoC) Regions



Development
Services Agency



Regions

- BoSCoC Regions
- Entitlement Counties

Ohio Development Services Agency
Office of Community Development

Date: 11/22/2019

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

Every year, the U.S. Department of Housing and Urban Development (HUD) makes federal resources available for homeless programming to communities around the country through its Continuum of Care (CoC) Program and its annual CoC Competition. Continuums access these funds by completing consolidated applications on behalf of the federally funded homeless programs in their CoC. For the Ohio Balance of State Continuum of Care (BoSCoC), the Collaborative Applicant (Development) and COHHIO facilitate this process and submit the consolidated application. Any organization located within the 80-county BoSCoC that wishes to access new or renewal CoC Program funds must participate in local homeless planning efforts and the annual BoSCoC Competition.

Statewide homeless policies are coordinated in collaboration with all Continua of Care through participation in the Housing and Homelessness Collaborative. The federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act requires that each Continuum of Care (CoC) establish targets and show annual progress in achieving those targets and reducing homelessness. The Collaborative will receive and review bi-annual progress reports in five primary population areas (veterans, chronic homelessness, families and children, youth and young adults and single adults). In addition, the Collaborative is committed to monitoring Ohio Department of Education data on homeless school-age children to understand homelessness under a broader definition of homelessness than used by HUD. By reviewing the bi-annual progress reports, the Collaborative will be able to celebrate success in progressing areas; adjust strategies and actions to identify and implement ways to improve progress in lagging areas, and address emerging needs by adopting or modifying strategies and actions to incorporate changing realities.

CoCs are required by HUD to maintain a functional HMIS, conduct an annual point-in-time count, regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress through several reporting mechanisms. Progress on these key measures will be assessed annually on an aggregate statewide and CoC basis (overall and by individual and family households):

- Overall reduction in the number of homeless individuals and families;
- The length of time individuals and families remain homeless;
- The length of stay in emergency shelter, transitional housing and rapid rehousing;
- Successful housing placement to or retention in a permanent housing destination;
- Successful placement from street outreach to emergency shelter, transitional housing or permanent housing destination;
- The extent to which individuals and families who leave homelessness experience a subsequent episode of homelessness;
- Jobs and income growth for homeless individuals and families;
- Success at reducing the number of individuals and families who become homeless for the first time;
- Utilization rate by intervention type (emergency shelter, transitional housing, and permanent supportive housing);
- Entries from homelessness by intervention type (emergency shelter, rapid rehousing, transitional housing, and permanent supportive housing);
- HMIS bed coverage and compliance with HUD data quality standards; and
- To be defined and if feasible: Cost efficiency to attain successful housing placement by intervention type (total cost/successful outcome)

State agencies (Development and OHFA) that fund targeted homelessness programs will report on annual funding allocations and identify ways these funding allocations support and align with the 2020-2024 Consolidated Plan. In addition, these agencies will begin incorporating the key measures described above into their funding processes and include progress on these measures as basis for continuing funding. Each funding program should establish a set of minimum standards and target performance standards. The 2020-2024 Consolidated Plan describes optimal performance metrics for some of the key measures which can be used to develop the targets. Implementing minimum standards and target performance standards provides an opportunity to identify and reward high-performing projects and provide targeted assistance to low-performing projects.

Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdictions consultations with housing, social service agencies and other entities

A number of stakeholders participated in the PY 2020 – 2024 Consolidated Plan planning process as outlined at https://development.ohio.gov/cs/cs_ocp.htm. As part of the PAC meetings briefly discussed above, the State was able to meet directly with housing, social service agencies and others. Listed below are the PAC meetings and members who participated:

**PY 2020 Consolidated Plan Housing Assistance Grant Program Advisory Committee
October 4, 2019 – Ohio EMA**

Full Name	Title	Organization
Kellie Ailes	Executive Director	Lancaster-Fairfield - CAP
Jennifer Atwell	Huron County Supervisor	Erie Huron Richland - CAC
Bambi Baughn	Executive Director	Fayette County - CAC
Ian Beniston	Executive Director	Youngstown NDC
Andrew Binegar	Executive Director	Pickaway County - CAO
Terry Boehm	Community Services Director	LEADS - CAA - OCD
Kerri Brammer	HomeOwnership Center Manager	Neighborhood Housing Springfield
Roger Carney	Controller	Community Housing Solutions
Teresa Cook	Chief of Marketing & Development	AAA - 5
Nina Creech	Vice President	People Working Cooperative
Glen Crippen	Housing Coordinator	Hocking, Athens, Perry CA
Kelly Feeney	Housing & Energy Director	Northwestern Ohio - CAC
Helen Fisher	Home Repair and Modifications Manager	Clermont Senior Services
Joe Gage	Housing Coordinator	BH-HV RDD
Marla George	Residential Services Associate Director	Bridges CAP
Martina Grimm	Community Services Director	Columbiana County - CAA
Kevin Hannahs	Executive Director	Society for Equal Access
Donnald Heckelmoser	Executive Director	Western Reserve CDC
Terry Jacobs	Housing & Energy Director	Great Lakes Community Action Partnership
Nina Keller	Assistant Director	AAA - 7
Ash Lemons	Grants Manager	Ability Center - Toledo
Toni Morgan	Program Coordinator	Home Is The Foundation
Kimetta Parker	Contract Developer & Compliance Manager	County Corp
Melissa Pearce	CEO	Wayne-Medina, CA of
John Peoples	Energy Coordinator	Jackson-Vinton - CA
Diana Roush	Housing Program Assistant	Gallia-Meigs - CAA
Bernard Salzman	Housing Trust Fund Coordinator	COAD
David Shea	Executive Director	Portage County - CAC
Jodi Sime	Senior Housing Program Manager	Modcon Living
Kenny Vigneron	Housing and Transportation Director	Washington-Morgan - CAPC

**PY 2020 Consolidated Plan Fair Housing / New Horizons Program Advisory Committee
October 28, 2019 – Riffe Center**

Name	Organization
Mary Church	City of Ashtabula
Kelan Craig	Ohio Housing Finance Agency (OHFA)
Matt Currie	Advocates for Basic Legal Equality (ABLE)
Bess Dunlop	Ohio Regional Development Corporation
Missy Frost	City of Fairborn
Julie Green	Trumbull County Commissioners Office
Michelle Hyer	Buckeye Hills Regional Council
Kris Keniray	Fair Housing Center for Rights & Research
Evelyn King	City of Cambridge
Julie Kiser	Ohio Regional Development Corporation
Greg Kramer	Access Center for Independent Living (ACILS)
Ash Lemons	The Ability Center of Greater Toledo
Tamra Lowe	City of Chillicothe
Heather Martin	LUC Regional Planning Commission
Joe Maskovyak	Coalition on Homelessness and Housing in Ohio (COHHIO)
Jim McCarthy	Miami Valley Fair Housing Center
Angie McConnell	WSOS Community Action
Sena Mourad-Friedman	The Fair Housing Center
Nathan Simons	Hocking Athens Perry Community Action
Karen Sprague	Gallia County
Janice Switzer	Ashtabula County Community Services and Planning
Kristie Tidd	Greene County
Ronnell Tomlinson	Ohio Civil Rights Commission
Charlene Watkins	Seneca Regional Planning Commission
Cheryl Wood	Trumbull County Planning Commission

**Consolidated Plan HOPWA Program Advisory Committee
November 5, 2019 via Conference Call**

Name	Title	Organization
Rebecca Callahan	Executive Director	Community AIDS Network
Julie Embree	Regional Housing Program Manager	Equitas Health
William J. Hardy	Executive Director	Equitas Health
Tiana Purvis	Housing Director	Equitas Health
Audrey Regan	Director, Chronic Disease Prevention	Columbus Health Dept.
Laurie Rickert	Administrator, HIV Programs	ODH, HIV Care Services Section

**PY 2020 Consolidated Plan CHIP Advisory Committee
November 4, 2019 – Ohio EMA**

Full Name	Title	Organization
Bambi Baughn	Chief Executive Officer	CAC Fayette County

John G. Belt	Program Supervisor, Ohio CLPPP	Ohio Department of Health
Jeremy Boggs	Housing Coordinator	HAPCAP
Michael Bogo	Deputy Director	Neighborhood Development Services, Inc.
Amy Coursen	Project Administrator	Ashtabula Planning and Development
Terri Fetherolf	Development Director	Vinton County
Gayle Flacynski	Housing Specialist	Poggemeyer Design Group, Inc.
Rebecca Hall	Consultant	Hall Community Development LLC
Missy Frost	CD Coordinator	City of Fairborn
Dawn Gates	Grant Specialist	Ashtabula County CSP
Dianne Guenther	Development Planner	City of Delaware
Marti Grimm	CHIP Administrator	CAA of Columbiana County
Dale Hartle	Consultant	Ohio Regional Development Corporation
Kim Haught	Director	City of Cambridge
Terry Jacobs	Housing & Energy Director	Great Lakes Community Action Partnership
Holly Johnson	Director	Adams County Housing/Economic Dev.
Liz Keel	Housing Coordinator	Maumee Valley Regional Organization
Ken Lengieza	Director	Marion County RPC
Johnathan Millea	Development Coordinator	City of Wooster
Ryan Miller	Executive Director	Habitat for Humanity
Dan Morganti	Grants & Neighborhood Programs Coordinator	City of Kent
Rob Platte	Community Development/ Compliance Planner	Licking County Planning and Development
Phil Puryear	Program Director	Mahoning County HH&LHC Program
Sheila Samson	Coordinator	Muskingum County Commissioners
Amy Schocken	Partner	CDC of Ohio
Karen Sprague	County Administrator	Gallia Co. Commissioners
Barry Strahorn	Housing Rehabilitation Director	Miami Valley Community Action Partnership
Kristie Tidd	Manager	Greene County DOD
A.C. Weithe	Assistant Director	Bel-O-Mar Regional Council
Chris Wojno	Consultant	Chris Wojno LLC
Cheryl Wood	Housing Specialist	Trumbull County Planning Commission

PY 2020 Consolidated Plan CD/ED/RPIG Advisory Committee

Name	Organization
Bill Arnett	Zanesville
Ryan Baker	City of Xenia
Jake Brand	Ashtabula County
Mary Church	City of Ashtabula
John Cleek	CDC of Ohio
Kelly Cole	Brown County
Jared Ebbing	Mercer County Economic & Community Development

Pam Ewing	RCAP
Lauren Falcone	Poggemeyer
Terri Fetherolf	Vinton County
Audrey Flood	Tiffin-Seneca Economic Partnership
Ethan Harris	Clark County Economic Development
Michelle Hyer	Buckeye Hills
Jessica Kaluga	Geauga County
Ralph Kline	ILCAO
Craig Knapke	Access Engineering
James Mako	Fairfield County RPC
Dennis Miller	MVPO
Susan Moore	ORDC
Renee Muhlenkamp	Mercer County Economic & Community Development
Katie Saba	W.E. Quicksall
Nathan Simons	HAPCAP
Krista Somerton	Van Wert Economic Development
Kurtis Strickland	RCAP
Evelyn Warr-Cummings	Marion RPC
Jeannette Wierzbicki	OMEGA

**Supportive Housing/Homeless Crisis Response Program Advisory Committee
November 6, 2019 @ State Library of Ohio**

Name	Title	Organization
Cindy Anderson	Director of Homeless Services	Ironton-Lawrence County Community Action Organization
Colleen Bain	Vice President of Supportive Housing	National Church Residences
Lianna Barbu	Operations Director	Community Shelter Board
Bambi Baughn	Executive Director	CAC of Fayette County
Fred Berry	President/CEO	HM Housing
Carlie Boos	Program and Policy Manager	Ohio Housing Finance Agency
Peg Dierkers	Shelter Operations Director	Bethany House
Beth Fetzer-Rice	Executive Director	Homeless Families Foundation
Denise Fox	Executive Director	Aurora Project (Toledo)
Ruth Gillett	Manager	Cleveland/Cuyahoga Office of Homeless Services
Martina Grimm	Community Service Director	CAA of Columbiana County, Inc.
Jeffrey Idom	CPD Representative	U.S. Department of Housing and Urban Development
Kevin James	Housing Policy & Homelessness Administrator	Ohio Department of Mental Health and Addiction Services
Jim Kennelly	VISN 10 Network Homeless Coordinator	U.S. Department of Veteran Services
Maura Klein	Program Manager	Ohio Department of Mental Health and Addiction Services
Colleen Kosta	Continuum of Care Program Manager	Help Network of Northeast Ohio
Linda Kramer	Executive Director	Daybreak, Inc.
Debbie Kubena-Yatsko	Executive Director	Medina Metropolitan Housing Authority

Tracey Lane	Housing Officer	YWCA Canton
Erica Mulryan	Continuum of Care Coordinator	Coalition on Homelessness and Housing in Ohio
Denise Stryker	Executive Director	Clinton County Services for the Homeless, Inc.
Tracie Taleff	Housing Program Manager	YWCA of Greater Cincinnati
Debbie Tegtmeier	Executive Director	Licking Coalition on Housing
Sue Villilo	Executive Director	Faith Mission
Nany Voitus	Executive Director	Catholic Charities Regional Agency
Amanda Wilson	HMIS Support Coordinator	Coalition for Homelessness and Housing in Ohio
Alice Worrell	Assistant Deputy Director	ODJFS, Office of Workforce and Development

In addition to the organizations listed above, the OCD distributed a Needs Survey, the results are included as an attachment, and also consulted with the following organizations, committees and agencies to help determine statewide needs:

Balance of State Continuum of Care Committee: Statewide homeless policies and services will be coordinated through the committee. The committee will assist in preparing the Ohio Balance of State Continuum of Care application.

Heritage Ohio, Inc. (HOI): The OCD staff will attend the HOI meetings to exchange information to help facilitate implementing OCD's Downtown Revitalization Grants Program. HOI is a recipient of a Training and Technical Assistance grant and works with OCD to provide assistance to small communities interested in downtown revitalization activities.

Ohio Department of Mental Health and Addiction Services (OhioMHAS): Representatives from OhioMHAS will participate in planning and reviewing the Homeless Crisis Response Program, Supportive Housing Program and balance of state Continuum of Care applications. OhioMHAS will also assist in marketing and providing technical assistance to any the OCD/ OhioMHAS-affiliated organization interested in applying for the OHTF Housing Assistance Grant Program funds. Representatives also advise OHFA on providing rental housing and necessary services for its population.

Ohio Association of Community Action Agencies (OACAA): The OCD will continue to work with OACAA and its member agencies, especially by drawing upon the expertise and knowledge of CAA staff to administer and implement OCD-funded programs.

Ohio Conference of Community Development (OCCD): OCCD's State Program Committee reviews OCD programs and policies, and the State Program Training Committee coordinates training issues and activities with the OCD.

Ohio Department of Health (ODH): The OCD will coordinate with ODH staff on lead-based paint activities, which will include training, housing and policy development. The OCD will also coordinate with the ODH on developing and implementing a statewide Healthy Home/Housing plan.

Community Development Finance Fund (CDFF): The OCD will coordinate efforts with the CDFF to provide both pre-development and project financing to nonprofit organizations.

Ohio CDC Association: OCD will coordinate efforts with the CDC Association on the microenterprise program, nonprofit housing and other related activities. OHFA works with the CDC Association on operating support for CHDOs and funding awards through HDAP.

Coalition on Homelessness and Housing in Ohio (COHHIO): The OCD staff will coordinate efforts with COHHIO relative to training, programs and activities relative to homelessness and housing. COHHIO will participate in preparing the state's Continuum of Care application. A representative of COHHIO also serves on the OHFA housing credit advisory committee.

Ohio Civil Rights Commission (OCRC): The OCD's fair housing coordinator will work with the Ohio Civil Rights Commission to address issues of mutual concern relative to civil rights and fair housing.

Ohio Historic Preservation Office (OHPO): The OCD staff will coordinate with the OHPO to address historic preservation issues that arise relative to housing, economic and community development projects, as well as providing training on preservation issues and procedures.

Ohio Capital Corporation for Housing (OCCH): The OCD staff will coordinate with OCCH to market and provide a series of housing development trainings throughout the state. OHFA works with OCCH regarding developing the housing credit program.

Corporation for Ohio Appalachian Development (COAD): The OCD will coordinate with COAD to provide training on lead-safe housing rehabilitation procedures to reduce lead hazards existing in low- and moderate-income housing stock.

ACTION Ohio: The OCD staff serve on the board of this statewide coalition against domestic violence, advocating for victims, survivors and their families.

Ohio Statewide Independent Living Council (SILC): The OCD staff will work with SILC to promote individuals with disabilities' equal access, full inclusion and integration into mainstream society.

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

The public participation process sought to include input from as many agencies throughout the state as possible. The OCD did not exclude any agencies specifically from the process. Many agencies participated in the Program Advisory Committee (PAC). For those not participating in the PAC meetings, the OCD distributed the Needs Assessment Survey statewide and made it available on Development’s website for any agency that wished to provide additional feedback.

Describe cooperation and coordination among the State and any units of general local government, in the implementation of the Consolidated Plan (91.315(I))

Development coordinated with units of general local government through a number of activities designed to encourage participation and feedback. Units of general local government are included as part of the Program Advisory Committee and participated as part of the Needs Survey. The County Commissioner’s Association of Ohio and the Municipal League assign representatives to review the draft plan at the Consolidated Plan Advisory Committee and multiple trainings are offered during the year to program administrators on how to implement the Consolidated Plan.

PR-15 Citizen Participation - 91.115, 91.300(c)

Summary of citizen participation process/Efforts made to broaden citizen participation

Summarize citizen participation process and how it impacted goal-setting

Below are several OCD citizen participation efforts made to obtain comments, perspectives, and citizen opinions when developing the PY 2020 – 2024 Ohio Consolidated Plan. The OCD provided notice of all public hearings and meetings at least 10 days in advance of the meetings through newsletters, public media advisories, direct mail, and posting on Development's website at http://development.ohio.gov/cs/cs_ocp.htm. Records of these actions and documentation are available for review at the OCD office between 8 a.m. and 5 p.m. at 77 South High Street, 26th Floor, Columbus, Ohio. All facilities and meeting times selected as part of the citizen participation process were chosen to accommodate persons with disabilities.

Public Hearing on Needs

The OCD held a public hearing on needs issues on September 12, 2019, in Room 1932 at 77 South High Street, 19th Floor, Columbus, Ohio. The OCD mailed Notification of the Public Hearing on Needs information to local communities, organizations and agencies throughout the state at least 30 days in advance. Development also published the notification on its website. The notification summarized the state's planning process for the Ohio Consolidated Plan Annual Action Plan and solicited participation in OCD's Program Advisory Committee meetings. The OCD accepted written comments on needs issues for a total of 15 days (from August 30, 2019 to September 15, 2019). The OCD distributed comments made at the Public Hearing on Needs, or received by OCD prior to the hearing's conclusion, to the advisory committee members for consideration during the planning process to help identify priority needs throughout the state.

Consolidated Plan Needs Surveys

In addition to the Public Hearing on Needs and related comment period, the OCD made a public survey available on Development's Ohio Consolidated Plan http://development.ohio.gov/cs/cs_ocp.htm on August 30, 2019, to determine the community/economic development, affordable housing and supportive housing needs across the state. The results from the surveys helped the state better understand the needs that exists throughout the state and set goals.

Program Advisory Committees

The **PY 2020-2024 Ohio Consolidated Plan Program Advisory Committee (PAC)** meetings provided an opportunity for stakeholders and the public to discuss and comment on specific policies, past performance/goals and

requirements pertaining to current OCD-administered programs. The following meetings took place following the Needs public comment period:

- On October 11, 2019, OCD held the Housing Assistance Grant Program Advisory Committee meeting in Room #104 at the Ohio Emergency Management Agency in Columbus, Ohio.
- On October 28, 2019, OCD held the Fair Housing Program Advisory Committee meeting in Room #1960 of the Riffe Center in Columbus, Ohio.
- On November 4, 2019, OCD held the Community Housing Impact and Preservation and Housing Assistance Grant Program Advisory Committee meeting in Room #204 at the Ohio Emergency Management Agency in Columbus, Ohio.
- On November 5 and 6, 2019, OCD held the Community/Economic Development and the Supportive Housing PAC meetings at the State Library of Ohio in Columbus, Ohio.
- On November 7, 2019, the Housing Development Assistance Program PAC meeting was held during the Ohio Housing Finance Agency's Annual Conference at the Greater Columbus Convention Center.

Notification of Public Comment Period and Distribution of Plan

On January 31, 2020, OCD sent notification to local communities, agencies, and organizations, informing them that the Draft PY 2020 – 2024 Consolidated Plan Draft PY 2020 Ohio Consolidated Plan Annual Action Plan, Executive Summary and National Housing Trust Fund Allocation Plan was to be made available on Development's website at http://development.ohio.gov/cs/cs_ocp.htm for review and comment. This notification announced the beginning of the mandatory 30-day public comment period on the draft plan, including a public hearing that was originally scheduled for March 19, 2020, at 10:30 a.m. at 77 South High Street, Room 1932, Columbus, Ohio. Due to the COVID-19 state of emergency the public hearing was carried out from April 13, 2020 to April 24, 2020. The updated memo can be found at https://development.ohio.gov/cs/cs_ocp-public-comment.htm. All comments received will be included, along with responses, in the final PY 2020 Ohio Annual Action Plan and National Housing Trust Fund Allocation Plan submitted to HUD.

Due to the fact that the NHTF allocation was released following the PY 2020-2024 Ohio Consolidated Plan public hearing and comment period, the NHTF Allocation Plan is required to be posted with the final allocation awarded to the state of Ohio included and submitted as a substantial amendment to the state of Ohio's PY2020-2024 Consolidated Plan.

The PY 2020 NHTF Allocation Plan was released for the public comment period on May 25, 2020, and was the subject of a Public Hearing on May 26, 2020 at 10:30 a.m. The final draft will be submitted to HUD following the public comment period. No comments were received regarding the PY2020 NHTF Allocation Plan during the comment process.

Needs Assessment

NA-05 Overview

Needs Assessment Overview

The State of Ohio Needs Assessment provides an overview of the housing, homelessness, and community development needs throughout the state. A major component of this section, in addition to data, existing reports, and plans, are the results from the State of Ohio PY 2020 – 2024 Consolidated Plan Needs Surveys covering housing, community/economic development and homelessness/supportive housing that was distributed on July 19, 2019. The survey was designed to better understand what community/economic development, housing and homelessness gaps and challenges exist.

The “Ohio Population Change by County 2010 – 2018” map on the following page illustrates how Ohio’s population shifted since 2010 by comparing the official U.S. Census 2010 decennial census data by county with the official 2018 population estimates provided by the U.S. Census Bureau. This map also shows the disparities between urban and non-urban counties, with most of the population growth taking place in urban counties. Ohio grew 1.3% during this period, which is relatively similar to surrounding states such as Michigan (1.1%), Pennsylvania (0.8%) and West Virginia (-0.2%). Note: the default data included in the next section does not include the most current data, as this data was provided by HUD.

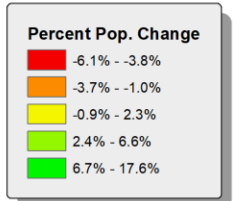
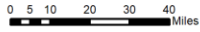
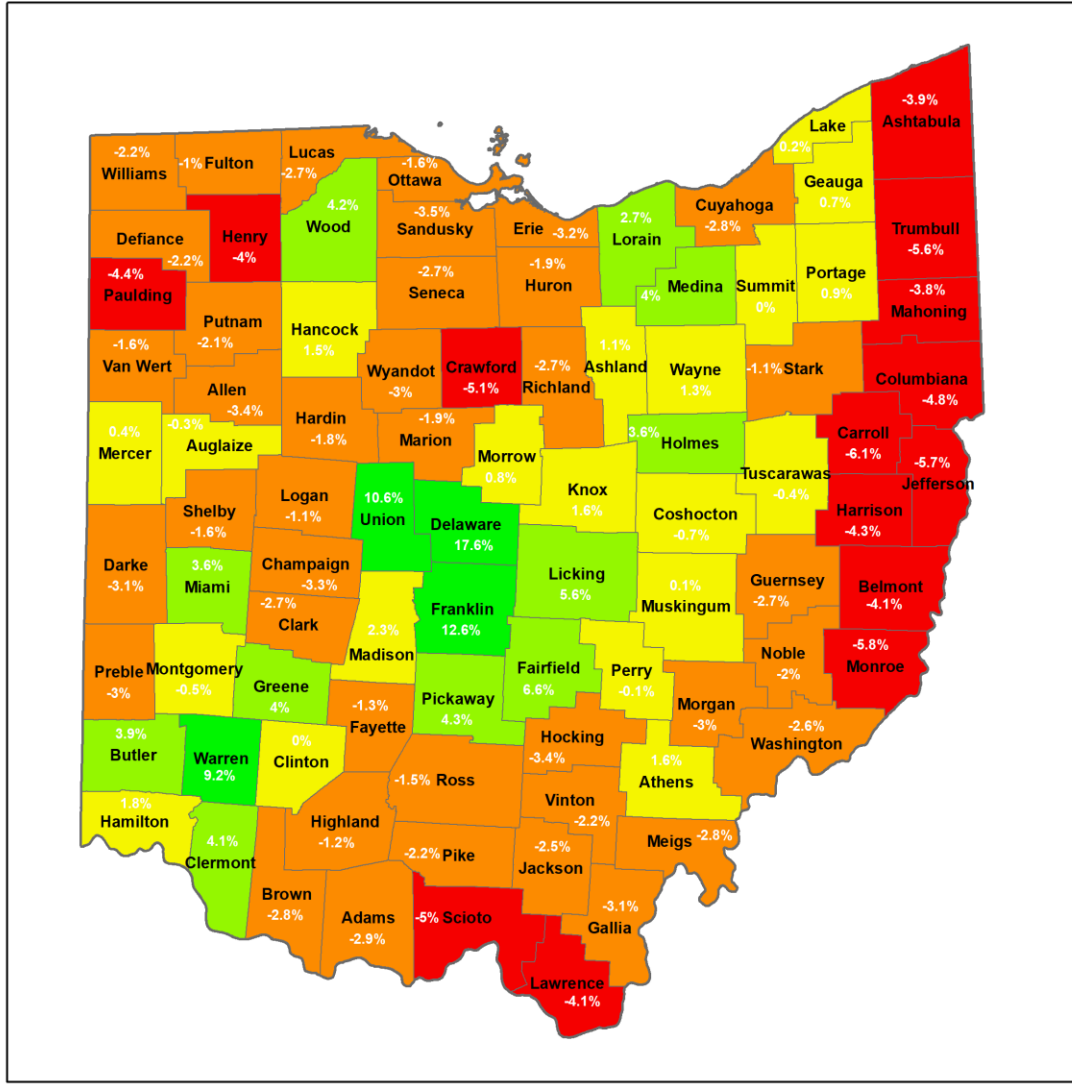
In the CDBG non-entitlement areas of the state the percentage of growth for all non-entitlement counties decreased by roughly 3%, with only 23 out of all 80 non-entitlement counties experiencing positive population growth. Much of the population loss is concentrated in the eastern and southern Appalachian counties, with many of these counties experiencing population loss for decades. Of the five (5) counties (Carroll, Monroe, Jefferson, Crawford, and Scioto) with the population loss greater than 5%, four (4) were located in the Appalachian region. Factors that contribute to population loss will be discussed throughout the Needs Assessment section. It should be noted that the percentage of population growth for the non-entitlement areas included urban entitlement communities’ population.

The “Median Household Income (MHI) by County as a Percentage of State MHI” map on page 18 provides a comparison of Ohio’s counties to the state’s MHI of \$52,407 as reported in the 2013-2017 Five-Year American Community Survey data. The state’s MHI is significantly less than the national 2017 MHI of \$60,336. The map reveals similarities found in the population change map with many of the eastern Appalachian-region counties, along with Crawford County, having median household incomes that are at or below 83.1% of the state of Ohio’s median household income. Many of the counties that exceed 105.5% of the state’s MHI are also in areas that experienced significant population increases, primarily in suburban counties of larger metropolitan statistical areas, although there are a few counties in northwestern Ohio that also have MHI above the state average.

Ohio Population Change by County 2010-2018



Development Services Agency



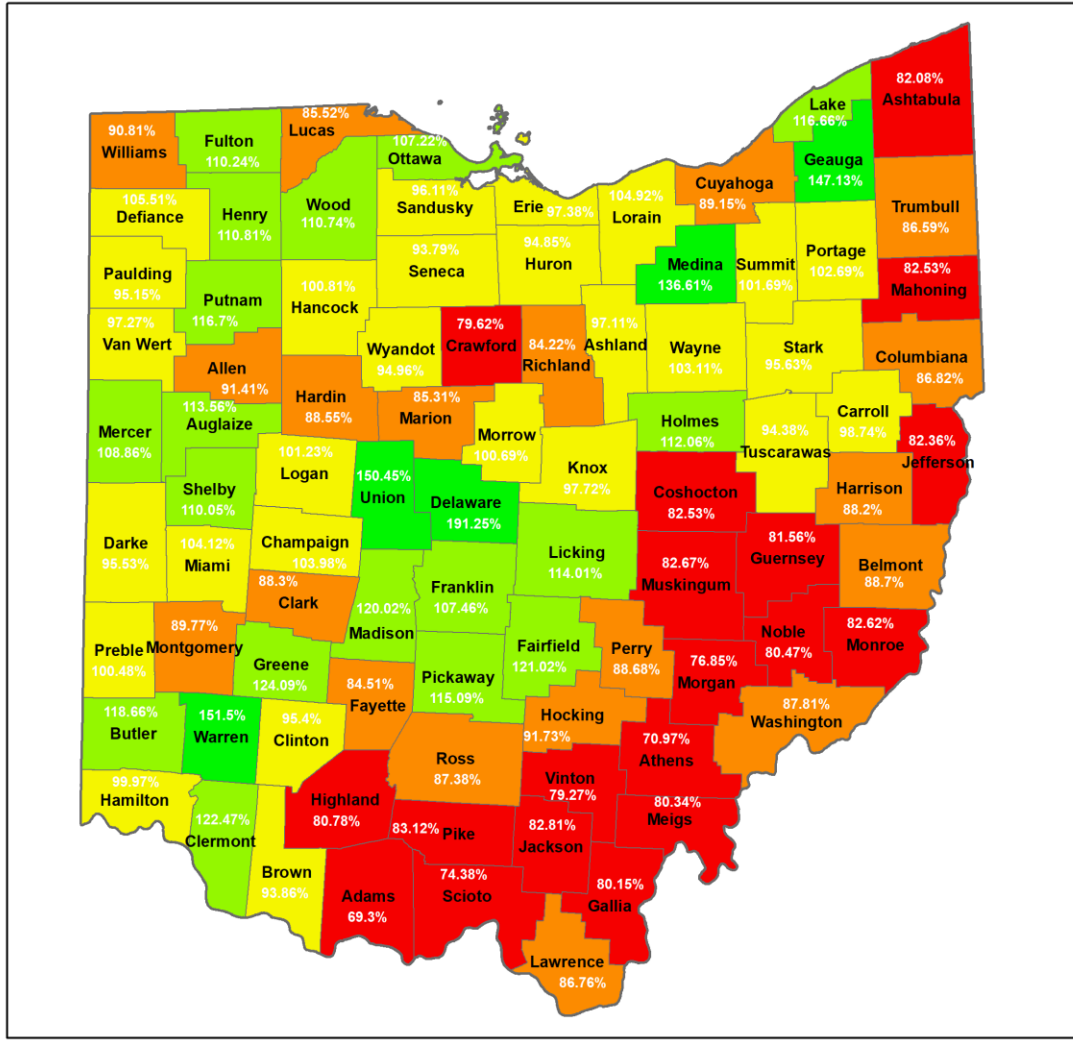
Ohio Development Services Agency
Office of Community Development
Source: 2010 US Decennial Census
2018 US Census Population Estimate

Date: 10/17/2019

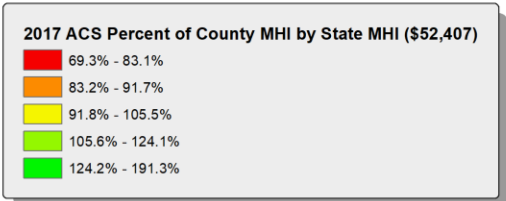
Median Household Income (MHI) by County as Percent of State MHI



Development Services Agency



0 5 10 20 30 40 Miles



Ohio Development Services Agency
Office of Community Development
Source: 2013-2017 5-Year American Community Survey Median Household Income

Date: 10/21/2019

NA-10 Housing Needs Assessment - 24 CFR 91.305 (a,b,c)

Summary of Housing Needs

The Ohio Housing Finance Agency (OHFA) annually prepares a [Housing Needs Assessment](#) to provide a comprehensive understanding of the critical housing trends and needs facing Ohioans. The report “uses a wide range of state data to identify the scale and scope of the state’s housing challenges. The Assessment evaluates Ohio’s current housing landscape to gauge housing needs, identify gaps, and highlight key trends. Beyond its role in the Annual Plan, findings from the Housing Needs Assessment inform OHFA’s programmatic and policy decisions throughout the year, such as the Qualified Allocation Plan (QAP), to ensure that every Ohioan has access to safe, affordable housing.”

As indicated in the report, “about half of Ohioans are cost burdened: they spend more than 30% of their income on housing. The challenge is particularly critical for Ohio's most vulnerable: 71% of the lowest earning groups spent more than 50% of their income on housing. There are not enough affordable units to serve Ohio's population. There are only 43 available and affordable rental units per every 100 extremely low-income renter household.

The housing affordability crisis is not limited to renters; homeowners in Ohio also face a tight market. Ohio's housing stock is old and has not kept pace with population change. Half of Ohio's housing units were built before 1965. The aging and limited stock has decreased vacancy rates and continued to the rising purchase prices.

Challenges to secure and maintain affordable housing are particularly difficult for Ohio's children and aging adults. Both children and seniors 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 is 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.”

In addition to the OHFA Housing Needs Assessment that will be referenced throughout the Consolidated Plan Housing Needs Assessment, Ohio conducted a Housing Needs Survey as part of the public comment period on needs in September and October 2019. The purpose of the survey was to identify specific housing issues and needs in the state from local communities and their residents and determine specific housing needs from the input gathered. A few of the key housing needs identified from more than 225 responses received from the housing survey include: affordable housing availability; services to prevent homelessness; temporary or transitional housing; tenant-based rental assistance; property maintenance; housing near transportation; homeownership assistance; weatherization; housing for disabled persons; and lead remediation. Additional information from the housing survey is included throughout this section, with a more detailed examination provided in each corresponding section.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	11,536,504	11,575,977	0%
Households	4,526,164	4,585,084	1%
Median Income	\$47,144.00	\$49,429.00	5%

Housing Needs Assessment Demographics Table

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Number of Households Table

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	630,325	558,435	801,920	474,690	2,119,710

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Small Family Households	199,280	164,835	264,260	180,190	1,127,510
Large Family Households	37,530	33,705	53,665	36,080	171,120
Household contains at least one person 62-74 years of age	97,985	116,160	181,435	114,150	447,110
Household contains at least one person age 75 or older	74,805	128,155	143,170	58,965	143,490
Households with one or more children 6 years old or younger	118,025	81,975	112,360	66,095	201,705

Total Households Table

Data 2011-2015 CHAS
Source:

Housing Needs Summary Tables

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	12,280	7,805	7,040	2,130	29,255	3,965	3,080	3,455	1,885	12,385
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	2,930	2,020	2,135	580	7,665	430	640	780	455	2,305
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	9,295	6,150	5,800	2,390	23,635	1,560	2,605	3,945	2,565	10,675
Housing cost burden greater than 50% of income (and none of the above problems)	258,615	59,895	8,700	1,065	328,275	104,350	65,705	40,750	8,285	219,090
Housing cost burden greater than 30% of income (and none of the above problems)	53,515	144,605	90,460	9,945	298,525	31,920	76,795	125,745	58,695	293,155
Zero/negative Income (and none of the above problems)	42,030	0	0	0	42,030	18,380	0	0	0	18,380

Housing Problems Table

Data 2011-2015 CHAS
Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Having 1 or more of four housing problems	283,120	75,870	23,675	6,165	388,830	110,305	72,030	48,930	13,195	244,460
Having none of four housing problems	121,495	218,410	299,180	141,200	780,285	55,000	192,125	430,140	314,130	991,395

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Household has negative income, but none of the other housing problems	42,030	0	0	0	42,030	18,380	0	0	0	18,380

Housing Problems 2 Table

Data 2011-2015 CHAS

Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	121,770	79,315	36,185	237,270	36,690	39,805	62,190	138,685
Large Related	23,690	12,925	4,645	41,260	6,885	9,825	12,080	28,790
Elderly	54,640	49,795	24,475	128,910	62,725	72,240	60,200	195,165
Other	130,975	72,760	37,380	241,115	33,780	23,695	34,435	91,910
Total need by income	331,075	214,795	102,685	648,555	140,080	145,565	168,905	454,550

Cost Burden > 30% Table

Data 2011-2015 CHAS

Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	102,145	19,965	1,475	123,585	30,205	20,175	13,670	64,050
Large Related	19,540	2,795	160	22,495	5,535	4,225	1,900	11,660
Elderly	39,685	18,670	5,595	63,950	43,575	29,030	17,250	89,855
Other	112,090	21,745	2,840	136,675	27,820	13,335	8,305	49,460
Total need by income	273,460	63,175	10,070	346,705	107,135	66,765	41,125	215,025

Cost Burden > 50% Table

Data 2011-2015 CHAS

Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	10,550	6,635	6,005	2,350	25,540	1,925	2,510	3,775	2,235	10,445
Multiple, unrelated family households	1,335	1,340	1,410	495	4,580	430	940	1,245	820	3,435
Other, non-family households	525	490	675	205	1,895	20	29	50	75	174
Total need by income	12,410	8,465	8,090	3,050	32,015	2,375	3,479	5,070	3,130	14,054

Crowding Information Table

Data 2011-2015 CHAS
Source:

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

As reported in the 2019 OHFA Housing Needs Assessment, “non-family households, most of which are individuals living alone, comprise more than half of renter households (52%) but only 28% of owner households.” In terms of estimating the number and type of single person households who need housing assistance, an examination of both the PY 2018 ESG CAPER and the 2019 Ohio Balance of State Continuum of Care (BoSCoC) point-in-time (PIT) will help to better understand the total number of persons in the state’s rural areas that are currently homeless or are being provided temporary housing assistance.

The State of Ohio’s PY 2018 ESG CAPER, covering the period from PY 2016 to PY2018, includes data from 29 organizations throughout the state that provide rapid rehousing, permanent supportive housing and shelter services. Of the 14,991 single persons without children assisted during that two-year period, the majority were male (73.2%), with nearly 67% of all single persons without children between the ages of 25 and 54. Approximately 54% of clients served were black with 42% white, and 3.4% of Hispanic ethnicity. Approximately 7% of the single persons assisted were veterans with 1.5% being chronically homeless.

Section Q23c of the PY 2018 ESG CAPER report, which provides the exit destination of persons assisted, provides the total number of single persons without children that will be in need of housing assistance. According to the data reported by the 29 organizations in HMIS, a total of 5,344 persons assisted will exit to temporary destinations, with another 560 exiting to institutional destinations. It can be assumed that these persons will need housing assistance immediately upon exit or in the near future.

Of the 2,100 single persons that reported in the 2019 BoSCoC PIT count, 708 were unsheltered. A total of 67% of the unsheltered were male, 32.7% female and one was a transgender person. Approximately 3% of the unsheltered were Hispanic, with the majority (86.2%) being white. Nearly a 25% were categorized as chronically homeless.

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

The state of Ohio’s PY 2018 ESG CAPER reported a total of 905 persons were fleeing domestic violence, with 3,266 reporting a history of domestic violence, with nearly one-third of all victims of domestic violence reported having children. It should be noted that the housing assistance provided to victims of domestic violence as reported in the ESG CAPER included rapid re-housing, permanent supportive housing or emergency shelter services.

Persons with physical and mental health conditions who received housing assistance, the following are estimates of persons assisted based on the specific conditions as reported at the start of housing assistance: 6,039 persons with a mental health problem; 772 persons with alcohol abuse; 1,354 persons with drug abuse; 1,108 with both

alcohol and drug abuse; 3,456 persons with chronic health conditions; 206 persons with HIV/AIDS; 1,118 persons with a developmental disability; and, 3,002 persons having reported a physical disability.

In addition to the PY 2018 ESG CAPER that provides an overview of the housing assistance needs based upon persons assisted, the State of Ohio's Point-in-Time (PIT) Subpopulations Summary data collected in 2017 for the Balance of State Continuum of Care (BoSCoC) area by the Coalition on Homelessness and Housing in Ohio (COHHIO) provides an examination of specific sub-groups of persons also in need of housing assistance.

Note: 2017 PIT data is used in this section because 2018 and 2019 PIT subpopulation data was not available at the time the Con Plan was submitted. 2019 PIT data is used in other sections of this report.

On January 24, 2017, the PIT reported a total of 1,439 homeless persons (738 sheltered and 374 unsheltered), with the following estimates based on condition being reported: 526 adults with serious mental illness, 303 adults with substance use disorder, three adults with HIV/AIDS and 607 victims of domestic violence. Specific information on the policies and guides used for collecting data along with the raw data can be found at <https://cohio.org/boscoc/hicpit/>. This data and the data reported in the ESG CAPER help to provide a complete picture of the housing assistance needs for persons who are either fleeing domestic violence or have a mental or physical health condition.

What are the most common housing problems?

As reported in the 2011-2015 Comprehensive Housing Affordability Strategy (CHAS) dataset, of the more than 713,000 low- and moderate-income renter households, more than 327,000 low- and moderate-income households experienced severe housing cost burden (greater than 50% of income), which represents 21.2% of all renters, making it the most common housing problem among renters. Of the more than 3.04 million owner households reported in the CHAS dataset, nearly 7.7% low- and moderate-income owners experienced housing cost burden (greater than 30% of income). The data reported in the 2011-2015 CHAS dataset aligns with the 2019 OHFA Housing Needs Assessment indicating that affordable and accessible housing remain the biggest and most common housing problems statewide.

The PY 2020-2024 Con Plan Needs Assessment Survey results provide additional information about specific housing problems reported by local communities. The housing survey asked the top five greatest housing problems that communities face. Of the 225 responses received, nearly 88% indicated affordable housing availability remains one of the top five greatest needs followed by services to prevent homelessness (56% of responses), temporary or transitional housing (48.4% of responses), tenant based rental assistance (37.7% of responses), housing near transportation (35.1% of responses) and rental property maintenance (32.9% of responses). A number of other housing issues were also noted in the survey such as housing for elderly residents, housing for physically disabled residents, housing for persons with other special needs, and homeownership.

As mentioned earlier, the survey results are attached and identify specific housing-related problems that both renters and homeowners face. Many of the problems align with the overall housing problems listed above and mirror many of the OHFA Needs Assessments findings, with affordable housing by far being the greatest housing problem that Ohioans face.

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

Based on the CHAS data as presented above, the following provides the household types most affected in the most common housing problems category (more than 50% housing burden for low- and moderate-income renters, more than 30% housing cost burden for low- and moderate-income owners). For low- and moderate-income renters with housing cost burden exceeding 50%, the elderly non-family household represented the largest household type at 26.1%, followed by large families at 22.5%. For low- and moderate-income owner households experiencing housing cost burden greater than 30% of income, elderly non-family households again represented the largest household type at 15.8%, with other household types next largest at 10.2% and large families at 6.9%. The low- and moderate-income owner household types experiencing the largest percentage of housing cost burden over 30% is very similar to that of low- and moderate-income renters with housing cost burden greater than 50% of income.

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

Low-income individuals and families with children that are currently housed but at imminent risk of homelessness face a number of circumstances that increase their likelihood of become unsheltered. As indicated in the 2012-2016 CHAS statistics summarized in the 2019 OHFA Needs Assessment the “typical Ohio renter pays 29% of their income toward rent and utilities, just below the 30% standard at which a household is considered housing cost burdened. Nearly three in four (73%) extremely low-income renters (30% AMI or less) experience severe housing cost burden, representing over 300,000 households. Nearly three in four very low-income renter households (31% to 50% AMI) and over a third of low-income renter households (51% to 80% AMI) also experience some level of housing cost burden.”

In terms of the needs of families and individuals receiving rapid re-housing assistance, case managers are assigned to work directly with the clients in order to develop a long-term housing plan specific to each client. The housing plan details how the client will transition into permanent housing beyond the maximum 24-month duration and is created once the client enters into rapid re-housing assistance. Families and individuals generally find permanent housing well before assistance ends.

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

The estimate of persons that can be categorized as at-risk can be found in HMIS. An assessment of the client’s status with regards to income, support networks and resources and current housing conditions are entered into HMIS as part of the prevention assistance program documentation. Ohio uses the HUD criteria of at-risk (https://files.hudexchange.info/resources/documents/AtRiskofHomelessnessDefinition_Criteria.pdf) to determine if individuals and families, unaccompanied children and youth or families with children and youth fall under that category.

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

Housing instability is directly linked to a multitude of characteristics, but primarily affordability. As reported in the previous section “nearly three in four (73%) extremely low-income renters (30% AMI or less) experience severe housing cost burden”. In addition to lack of affordable housing there are also a number of other contributing factors directly linked with instability and an increased risk of homelessness such as substance abuse, mental and physical disabilities and domestic violence, as previously noted. Approximately 22.6% of all persons assisted through rapid re-housing, permanent supportive housing or shelter as reported in the 2018 ESG CAPER had a mental health problem, with 12% having reported substance abuse. The issue of substance abuse, particularly the opiate crisis in Ohio, remains a significant contributing factor for increased risk of homelessness.

Discussion

As reported in the 2019 OHFA Housing Needs Assessment, the 2020-2024 Ohio Consolidated Plan Needs Survey and 2011-2015 CHAS dataset, housing affordability remains the greatest housing problem impacting the state. Further analysis will be included in sections NA 15 to NA 25 of the Needs Assessment as well as part of the Market Analysis section of the PY 2020-2024 Ohio Consolidated Plan.

NA-15 Disproportionately Greater Need: Housing Problems - 91.305 (b)(2)

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

Introduction

The following tables provide a summary of the housing problems impacting 0-100% AMI households for racial and ethnic groups in Ohio. It should be noted that the data includes both entitlement and non-entitlement areas.

Housing cost burden greater than 30% of income for 0-100% AMI households remains the greatest housing problem impacting renters (39.9%) and owners (14.6% alike as reported in the 2011 – 2015 CHAS dataset.

Note: The housing cost burden more than 50% of income is included as part of the calculation. The next largest housing problem included in the disproportionately greater need category is substandard housing conditions, with 1.8% of renter households experiencing housing that lacks complete plumbing or kitchen facilities and 0.3% of owner households. Overcrowded housing appears to impact 0-100% AMI renters (1.4%) much more than owners (0.3%). A summary of each income category by racial and ethnic group will be included in the discussion portion of the section.

0%-30% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	457,695	90,211	46,076
White	310,536	62,269	27,524
Black / African American	117,078	23,882	14,733
Asian	5,233	572	1,490
American Indian, Alaska Native	1,597	246	211
Pacific Islander	8	0	15
Hispanic	15,376	1,922	1,394

Disproportionally Greater Need 0 - 30% AMI Table

Data 2011-2015 CHAS
Source:

*The four housing problems are:

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

30%-50% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	350,131	183,012	0
White	267,439	153,593	0
Black / African American	63,624	22,161	0
Asian	3,742	1,245	0
American Indian, Alaska Native	803	321	0
Pacific Islander	49	10	0
Hispanic	10,472	3,621	0

Disproportionally Greater Need 30 - 50% AMI Table

Data 2011-2015 CHAS
Source:

*The four housing problems are:

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

50%-80% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	311,115	498,940	0
White	253,690	419,566	0
Black / African American	42,785	59,640	0
Asian	3,836	4,039	0
American Indian, Alaska Native	537	743	0
Pacific Islander	14	89	0
Hispanic	7,066	10,572	0

Disproportionally Greater Need 50 - 80% AMI Table

Data 2011-2015 CHAS

Source:

*The four housing problems are:

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

80%-100% of Area Median Income

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	115,712	386,193	0
White	98,817	331,779	0
Black / African American	11,804	39,422	0
Asian	1,566	4,278	0
American Indian, Alaska Native	111	475	0
Pacific Islander	0	169	0
Hispanic	2,335	6,194	0

Disproportionally Greater Need 80 - 100% AMI Table

Data 2011-2015 CHAS

Source:

*The four housing problems are:

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

Discussion

Based on the data included in the tables above, the following summary provides an overview of the ethnic and racial groups that disproportionately experience housing problems above the state's average for each income category. Hispanic households in the 0-30% AMI category have the largest proportion above the state average of 77%, with 82.2% experiencing one or more of four housing problems, although not technically classified as disproportionately impacted (10% above average of state). White and black households in the state that have the greatest proportion of population in the 0-30 AMI income category have 77.5% and 75.1%, respectively, experiencing one or more of four housing problems. All minority households in the 30-50% AMI income category have rates of households experiencing one or more of four housing problems above the state 65.6% state average with 74% of both Hispanic and black households experiencing these problems. The data reported in the 50-80% AMI and 80-100% AMI categories regarding racial and ethnic groups experiencing one or more of four housing problems in relation to the state average is very similar, with white households, Pacific Islander and American Indian households the only other households below the state averages.

NA-20 Disproportionately Greater Need: Severe Housing Problems – 91.305(b)(2)

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

Introduction

The following tables provide a summary of the severe housing problems impacting 0-100% AMI households for racial and ethnic groups in Ohio. The data includes both entitlement and non-entitlement areas of the state. Further analysis is needed to understand the severe housing problems in rural areas.

Housing cost burden greater than 50% of income for 0-100% AMI households remains the greatest housing problem impacting renters (21.2%) and owners (6.9%) as reported in the 2011 – 2015 CHAS dataset. The next largest severe housing problems included in the disproportionately greater need are substandard housing conditions, with 1.8% of renters experiencing housing that lacks complete plumbing or kitchen facilities and 0.3% of owners. Overcrowded housing, more than 1.5 persons per room, appears to impact 0-100% AMI renters (0.5%) much more than owners (0.1%). A summary of each income category by racial and ethnic group will be included in the discussion portion of the section.

0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	374,392	173,427	46,076
White	251,510	121,299	27,524
Black / African American	97,346	43,591	14,733
Asian	4,628	1,167	1,490
American Indian, Alaska Native	1,405	425	211
Pacific Islander	8	0	15
Hispanic	13,152	4,129	1,394

Severe Housing Problems 0 - 30% AMI Table

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:

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

30%-50% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	147,510	385,376	0
White	112,979	307,883	0
Black / African American	25,797	60,007	0
Asian	1,897	3,103	0
American Indian, Alaska Native	397	719	0
Pacific Islander	19	40	0
Hispanic	4,601	9,488	0

Severe Housing Problems 30 - 50% AMI Table

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:
 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

50%-80% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	81,444	728,846	0
White	67,382	606,003	0
Black / African American	9,556	92,878	0
Asian	1,410	6,480	0
American Indian, Alaska Native	227	1,049	0
Pacific Islander	0	103	0
Hispanic	2,100	15,520	0

Severe Housing Problems 50 - 80% AMI Table

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:
 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

80%-100% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	22,646	479,270	0
White	19,019	411,604	0
Black / African American	2,079	49,146	0
Asian	527	5,318	0
American Indian, Alaska Native	4	582	0
Pacific Islander	0	169	0
Hispanic	764	7,758	0

Severe Housing Problems 80 - 100% AMI Table

Data 2011-2015 CHAS
Source:

*The four severe housing problems are:
 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost Burden over 50%

Discussion

Based on the data included in the tables above the following summary provides an overview of the ethnic and racial groups that disproportionately experience severe housing problems above the state’s average for each income category. Hispanic households in the 0-30% AMI have the largest proportion above the state average of 63%, with 70.4% experiencing one or more of four severe housing problems. White and black households in the state, which have the greatest population in the 0-30% AMI income category, have 62.8% and 62.5%, respectively, experiencing one or more of four severe housing problems. All minority households in the 30-50% AMI income category have rates of households experiencing one or more of four severe housing problems above the state

average of 27.6%, with Asian households having the highest rate within the 30-50% AMI category at 37.9%. The data reported in the 50-80% AMI and 80-100% AMI categories with regards to racial and ethnic groups experiencing one or more of four severe housing problems in relation to the state average is very similar, with the rate of white and black households nearly identical to the state averages of 10% for 50-80% AMI and 4.5% in the 80-100% AMI category.

NA-25 Disproportionately Greater Need: Housing Cost Burdens – 91.305 (b)(2)

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

Introduction

As discussed previously, higher levels of housing problems exist for minority populations based on the four criteria of housing problems and severe housing problems. By reviewing the most prevalent housing problem (housing cost burden) according to the 2011-2015 CHAS data, a clearer picture as to which minority groups are most impacted emerges. Based on the disproportionately greater need definition of being at least 10 percentage points greater than the state average, both Hispanic and Black households experience disproportionately greater need in terms of housing cost burden in excess of 30% of income and 50% of income. As mentioned before, it is not clear if the data provided includes direct HUD entitlement geographic areas, which is an important element in understanding the specific issues that non-entitlement communities face across the state.

Housing Cost Burden

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	3,124,879	765,573	588,317	48,283
White	2,739,776	616,588	426,629	28,586
Black / African American	265,004	112,799	126,159	15,498
Asian	40,648	9,029	7,640	1,635
American Indian, Alaska Native	4,628	1,298	1,808	231
Pacific Islander	705	78	27	15
Hispanic	49,177	17,244	17,377	1,613

Greater Need: Housing Cost Burdens AMI Table

Data 2011-2015 CHAS
Source:

NA-30 Disproportionately Greater Need: Discussion – 91.305 (b)(2)

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

As was discussed previously, Hispanic households in the 0-30% AMI category have disproportionately greater need, with 82.2% experiencing one or more of four housing problems, nearly 5% over the state average. All minority households in the 30-50 % AMI income category have rates of households experiencing one or more of four housing problems above the 65.6% state average, with both Hispanic and black households with rates of 74%.

Hispanic households have the largest proportion of population over the 63% state average, with 70.4% experiencing one or more of four severe housing problems in the 0-30% AMI income category. All minority households in the 30-50% AMI income category have rates of households experiencing one or more of four severe housing problems over the state average of 27.6%, with Asian households having the highest rate within the 30-50% AMI category at 37.9%.

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

As noted in the previous sections, housing cost burden (affordability) remains the greatest housing problem impacting households across the state. In addition to housing cost burden there are additional housing problems identified by many rural communities in the PY 2020-2024 Ohio Consolidated Plan Needs Survey. The following are the 15 greatest housing needs identified in the survey with percentage received:

- Availability of affordable housing (87.5%)
- Services to prevent homelessness (56%)
- Temporary or transitional housing (48.4%)
- Tenant-based rental assistance (37.8%)
- Housing near transportation (35.1%)
- Rental property maintenance (32.9%)
- Housing for elderly residents (26.7%)
- Housing for residents with other special needs (26.2%)
- Housing for physically disabled residents (24%)
- Homeownership (20.9%)
- Private home property maintenance (19.1%)
- Home weatherization (15.6%)
- Support services (11.1%)
- Accessibility to medical services (10.2%)
- Lead remediation (6.7%).

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

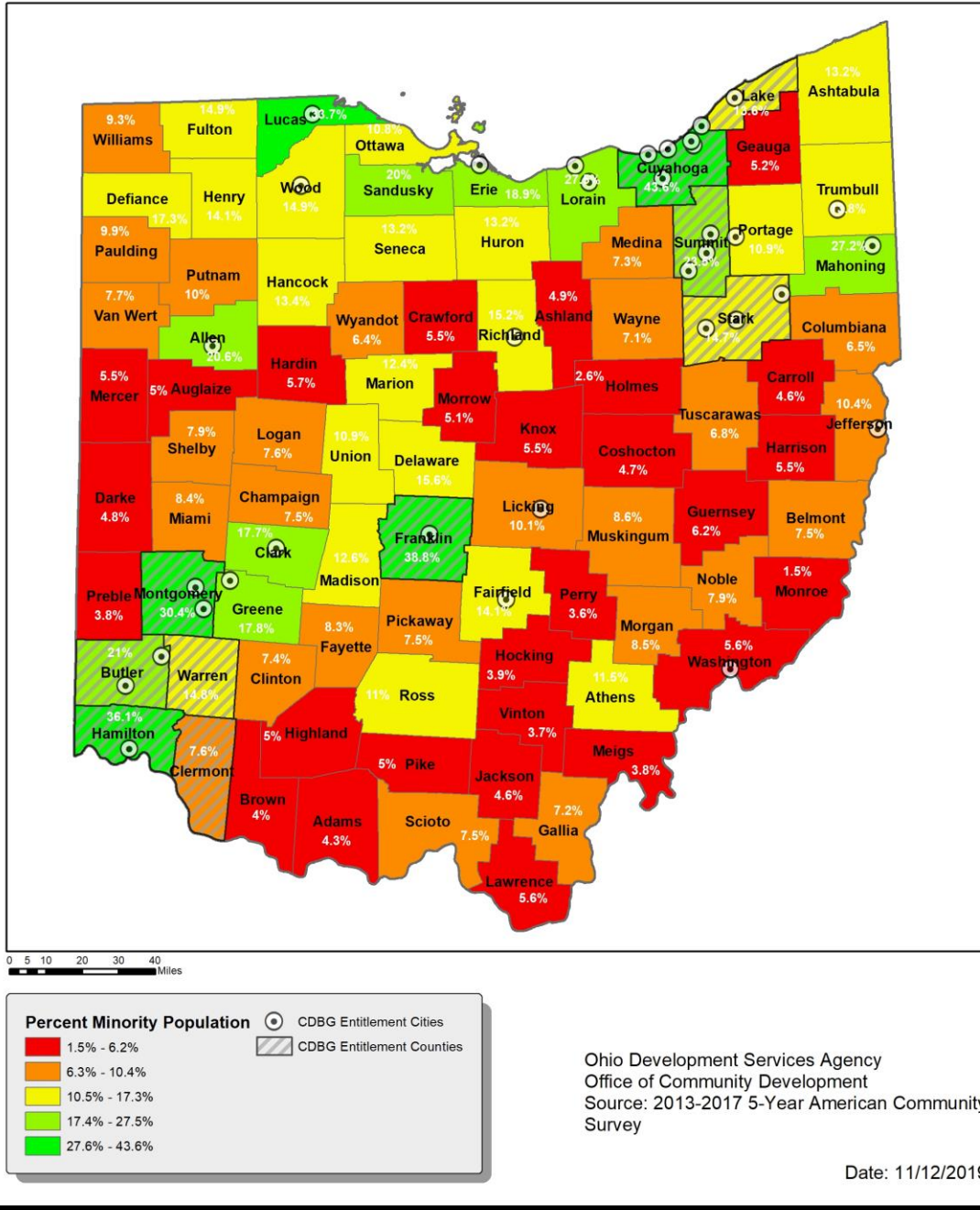
As was discussed previously, the issue of whether the 2011-2015 CHAS data includes entitlement data presents a few challenges in analyzing specific areas of CDBG non-entitlement areas. The following map includes the percentage of minority population by county in the state based on the 2013-2017 ACS 5-year estimates to determine the counties with minority populations over or under the 22.6% state average. Based on the minority population map there are no CDBG non-entitlement counties that do not contain CDBG entitlement communities with minority populations higher than the state average. Sandusky County has the largest minority population (20%) of all non-entitlement counties with no entitlement cities included. Further analysis will be needed to determine if any particular ethnic and racial groups are located within the non-entitlements counties throughout the state to understand what housing problems impacting these particular groups exist.

As was noted as part of the Development's Office of Research "Population Characteristics and Projections" the majority of African Americans in Ohio live in urban areas. Four out of every 10 African Americans in the state live in the cities of Cincinnati, Cleveland, or Columbus. In Columbus there are 290,000 African American residents; 197,000 in Cleveland; and 133,000 in Cincinnati. The Cleveland metropolitan area alone is home to more than 25 percent of Ohio's African American population.

The majority of Hispanic Ohioans live in urban areas of the state. One out of every three Hispanic Ohioans live in one of four cities: Cleveland, Columbus, Lorain and Toledo. In Columbus there are 54,000 Hispanic residents, in Cleveland there are 47,000, in Toledo there are 25,000 and in Lorain, 19,000. The Hispanic population makes up a higher proportion of county populations in the north and northwest sections of Ohio, many of which are rural. In Ohio's Appalachian region, Hispanics represent 1.9 percent of the region's population.

A majority of Asian American Ohioans live in the state's metropolitan areas. Generally, Asian Americans in Ohio are as likely to live in the suburbs as the central city. The city of Columbus is an exception with more Asian Americans living in the city because of the influence of The Ohio State University. More than 65,000, or 19 percent, of Ohio's Asian population live in Columbus. There are another 50,000 Asian American Ohioans living in the Columbus metropolitan area. The Cleveland-Akron metropolitan area has more than 92,000 Asian Americans residents. In Ohio's Appalachian region, Asians represent .6 percent of the region's population.

Percent Minority Population by County



NA-35 Public Housing – (Optional)

Introduction

Ohio and its agencies are not designated as a public housing authority nor do they administer public housing units. These functions are performed by local public housing authorities. Public housing authorities must continue to provide the state with annual and five-year plans as part of the Certification of Consistency with the State of Ohio's Consolidated Plan. The list of Public Housing Authorities in the state can be found on the HUD website at <https://www.hud.gov/states/ohio/renting/hawebsites>

Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	288	10,792	29,359	17	27,320	91	321	1,355

Public Housing by Program Type Table

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

Data Source: PIC (PIH Information Center)

Characteristics of Residents

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	
# Homeless at admission	0	12	80	62	0	52	6	2	
# of Elderly Program Participants (>62)	0	22	2,407	4,821	5	4,556	6	3	
# of Disabled Families	0	62	2,893	11,347	6	10,008	30	60	
# of Families requesting accessibility features	0	288	10,792	29,359	17	27,320	91	321	
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0	
# of DV victims	0	0	0	0	0	0	0	0	

Characteristics of Public Housing Residents by Program Type Table

Data Source: PIC (PIH Information Center)

Race of Residents

Race	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	214	8,687	24,008	15	22,148	77	276	1,286
Black/African American	0	72	2,053	5,124	2	4,950	11	43	69
Asian	0	1	19	44	0	43	0	1	0
American Indian/Alaska Native	0	1	29	150	0	147	3	0	0
Pacific Islander	0	0	4	30	0	29	0	1	0
Other	0	0	0	3	0	3	0	0	0

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

Race of Public Housing Residents by Program Type Table

Data Source: PIC (PIH Information Center)

Ethnicity of Residents

Ethnicity	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project-based	Tenant-based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	4	476	1,102	0	1,031	0	2	48
Not Hispanic	0	284	10,316	28,254	17	26,286	91	319	1,307

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

Ethnicity of Public Housing Residents by Program Type Table

Data Source: PIC (PIH Information Center)

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

This section is not applicable. The state and its agencies do not administer public housing units.

What are the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the jurisdiction, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

This section is not applicable. The state and its agencies do not administer public housing units.

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

This section is not applicable. The state and its agencies do not administer public housing units.

NA-40 Homeless Needs Assessment – 91.305(c)

Introduction:

Development serves as the lead entity for Ohio's Balance of State Continuum of Care (BoSCoC), which includes 80 of the state's 88 counties. As mandated by the U.S. Department of Housing and Urban Development (HUD), the state is required to conduct point-in-time (PIT) counts for all sheltered and unsheltered homeless persons for the BoSCoC. Responses in subsequent NA-40 section of the Needs Assessment will utilize the 2019 PIT data whenever possible, but it should be noted that the PIT data is only a snapshot of the homeless situation as reported on January 22, 2019, which doesn't provide the full homeless count. More detailed information regarding the total number of sheltered and unsheltered persons as part of the 2019 PIT count is available for all 80 BoSCoC counties at <https://public.tableau.com/profile/ohioboscoc#!/vizhome/2019PointinTimeCountOhioBalanceofStateCoC/Individuals>.

In addition, as part of the PY 2020-2024 Consolidated Plan Needs Assessment, Development conducted a homelessness survey that sought input directly from homeless service providers and the public to better understand the homeless community's needs. Based on input received from over 300 grantees and individuals, many of the top needs facing the homeless community were also reported from housing providers as part of the previously discussed housing survey. Respondents identified the following areas as the top five homelessness needs:

- Availability of affordable housing (88.9%)
- Rental assistance to prevent homelessness (64.7%)
- Services to prevent homelessness (56.4%)
- Rental assistance to homeless individuals (56%)
- Temporary or transitional housing (52%)
- Support services (38.2%)
- Emergency shelter maintenance/repair (28.9%)
- Housing for people with other special needs (27.2%)
- Housing for elderly residents (24.5%)
- Housing for people with physical disabilities (22.5%)

The PY 2018 ESG CAPER data will be utilized whenever possible to fill in the gaps in reporting sections of this report where PIT is not available. The ESG CAPER captures data from ESG awards which can be located in both urban and rural areas, while the BoSCoC only covers the state's rural areas. Answers provided in the next sections of the report will try to note geographic coverage when available.

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

The most recent annual BoSCoC System Performance Measures Report submitted to HUD by COHHIO (10/1/2017 – 9/30/2018), indicated a total of 11,916 sheltered persons experienced homelessness, with 10,716 persons experiencing homelessness for the first time. Approximately, 70% exited to permanent housing, with 61 days being the average numbers of days spent homeless. The median number of days homeless was 33.

In addition to its System Performance Report annual submittal, COHHIO is also required to submit the Longitudinal Systems Analysis (LSA) report to HUD which provides data on the households, not persons, experiencing homelessness in the BoSCoC. In the 2019 LSA report, 1,366 households with adults and children exited homelessness, with the average household experiencing homelessness for an average of 55 days. In 2018, 4,576 households with adults only, the largest group exiting homelessness, averaged homelessness six (6) days less than adults with children. The smallest group, households with only children, accounted for 11 households exiting homelessness as reported in 2018, with the average length of homelessness eight (8) days.

As mentioned above, the numbers included in both the System Performance and LSA reports only consider the totals and do not enumerate on subgroups. The number of persons exiting homelessness can best be answered by examining the data provided by the ESG grant recipients to the State of Ohio as part of the PY 2018 ESG CAPER, which includes a number of grantees located in urban areas of the state. The PY 2018 ESG CAPER reports on two-year awards Development made to organizations between PY 2016 and PY 2018 for rapid-re-housing, permanent supportive housing as well as shelter projects. Based on data included in the Q23c – Exit Destination table of the report, approximately 29.1% of individuals without children, 53.8% of persons with children and adults, and 50.3% of persons with only children exited to a permanent positive housing destination.

Describe the Nature and Extent of Unsheltered and Sheltered Homelessness in rural areas.

The true nature and extent of homelessness in rural areas of the state is difficult to determine as the PIT is just an estimate and other reports do not include subgroups. To better understand the nature and extent of homelessness in rural Ohio, COHHIO created a website that includes service provider locations with bed and unit utilization rates along with statewide performance and outcomes based on data entered into HMIS at <https://ohiobalanceofstatecoc.shinyapps.io/Rminor/>. This tool is extremely helpful for rural communities to better understand the full extent of homelessness by populations served and the providers' bed needs.

The responses from the homelessness survey indicated that a lack of beds in rural areas, a lack of public transportation and recovery housing for both sheltered and unsheltered are some of the prevailing needs in the state's more rural areas.

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

The 2019 BoSCoC PIT count reported a total of 1,377 persons in households with at least one adult and one child were documented as homeless. Of those, 1,273 were sheltered and 104 were unsheltered. A total of 197 veteran households, which includes both veterans with children and veterans without children, were homeless. Of that number, 156 veterans were sheltered and 41 unsheltered.

For comparison purposes, the PY 2018 ESG CAPER indicates 46% of adults with children did not exit housing assistance to a positive housing destination. Nearly, 20% of veterans were categorized as being chronically homeless, making them particularly vulnerable to experiencing repeated homelessness.

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

The majority of sheltered persons identified in the state's rural counties were white (75.2%), with 19% black and 4.2% Hispanic. Of the unsheltered persons reported, 86.9% were white, 10.2% black and 3.1% Hispanic. For comparison purposes, the 2013-2017 ACS data for the 80 BoSCoC counties indicated that the region is comprised of 89.8% white, 3.7% black and 2.9% Hispanic people, which is relatively similar to the proportion of reported sheltered and unsheltered persons.

To understand how the level of need based on race and ethnicity changed over time, a comparison with the 2014 BoSCoC PIT data is extremely helpful. Based on the comparison, the percentage of sheltered white persons declined by nearly 5% while the percentage of sheltered black persons increased 5%, with the Hispanic persons sheltered remaining relatively the same. Documented unsheltered white persons decreased 2%, unsheltered black persons increased 2% and unsheltered Hispanic persons decreased 2%.

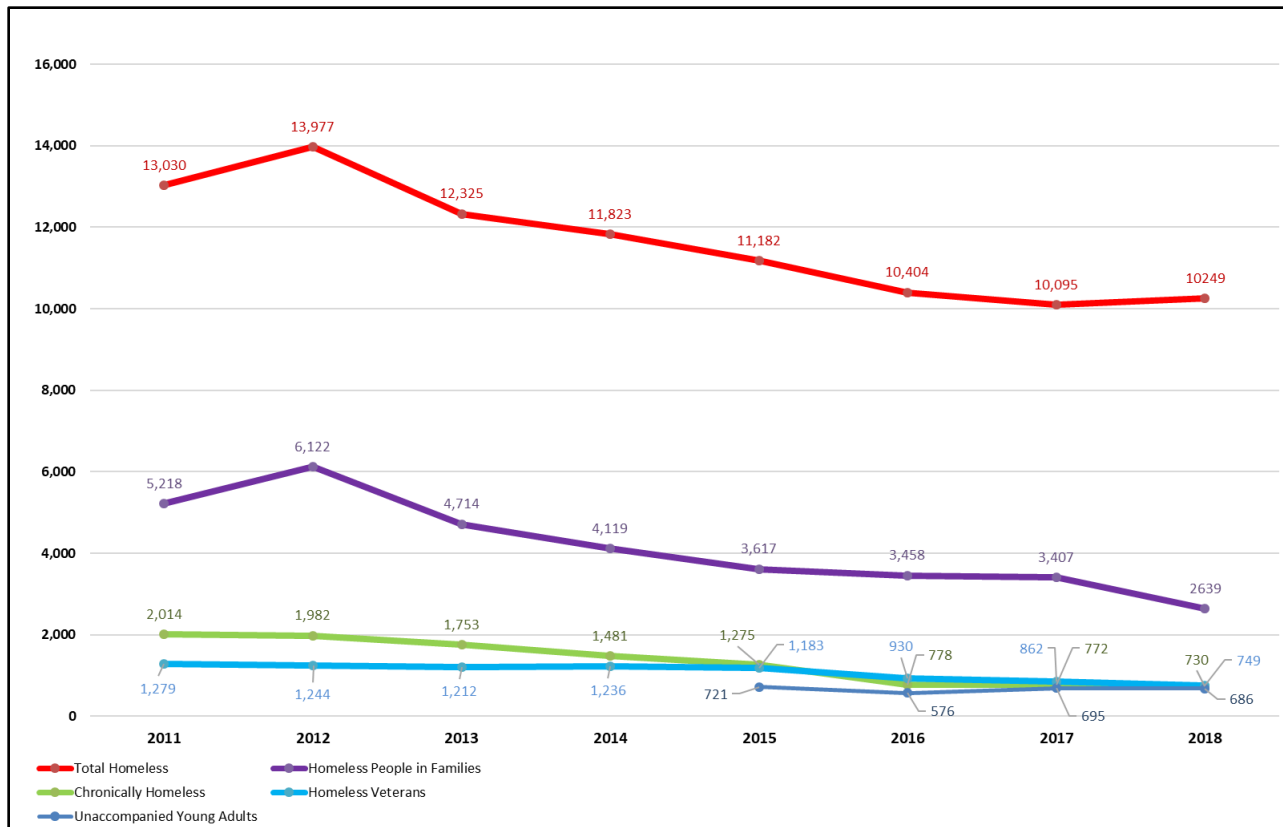
Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.

The previously reported data on the extent and nature of homelessness in rural areas relied on the BoSCoC data, which covered the state's 80 rural counties. For a state analysis of the nature and extent of homelessness for sheltered and unsheltered, the United State Interagency Council on Homelessness (USICH) compiled and summarized the annual CoC data, which includes both urban CoCs and the BoSCoC.

USICH reported that "as of January 2018, Ohio had an estimated 10,249 experiencing homelessness on any given day, as reported by Continuums of Care to the U.S. Department of Housing and Urban Development (HUD). Of that total, 1,015 were family households, 749 were veterans, 686 were unaccompanied young adults (aged 18-24), and 730 were individuals experiencing chronic homelessness.

Public school data reported to the U.S. Department of Education during the 2016-2017 school year shows that an estimated 29,403 public school students experienced homelessness over the course of the year. Of that total, 411 students were unsheltered, 4,852 were in shelters, 1,607 were in hotels/motels, and 22,533 were doubled up."

The following chart helps illustrate the trend in homelessness by subgroup. As indicated in the chart, since 2011 overall homelessness for the state declined, but there remains a relatively stable unaccompanied young adult homeless population.



Ohio 2011 – 2018 Point-in-Time Counts by Sub-Group Graph

Source: Ohio Point-in-Time Counts 2011-2018

NA-45 Non-Homeless Special Needs Assessment – 91.305 (b,d)

Introduction

Section NA-45 of the Needs Assessment addresses the state’s special needs population, which can include persons that have at least one of the following disabilities: hearing difficulty; vision difficulty; cognitive difficulty; ambulatory difficulty; self-care difficulty; and, independent living difficulty. Currently, 13.8% of all Ohioans have at least one disability as reported in the 2013-2017 ACS 5-Year Estimates, which places the state above the 12.6% national average.

The PY 2020 – 2024 Consolidated Plan Surveys identified support services and housing services for persons with disabilities as important needs. Approximately 27.2% of responses received indicated that housing for persons with special needs was a top-five need and a total of 20.5% of respondents indicated that Americans with Disability Act accessibility improvements are needed. A lack of services or housing not only would put these populations at risk of being homeless, but also at risk for injury and possibly death.

In addition to utilizing the most current data available along with input received from the public as part of the citizen participation process and needs surveys, Development has consulted with OHFA, OhioMHAS and ODoDD to assist in addressing special needs populations throughout this section.

HOPWA

Current HOPWA formula use:	
Cumulative cases of AIDS reported	11,551
Area incidence of AIDS	-
Number of new cases prior year (3 years of data)	248
Rate per population	-
Rate per population (3 years of data)	-
Current HIV surveillance data:	
Number of Persons living with HIC (PLWH)	12,579
Area Prevalence (PLWH per population)	-
Number of new HIV cases reported last year	741

HOPWA Data Table

Data CDC HIV Surveillance
Source:

HIV Housing Need (HOPWA Grantees Only)

Type of HOPWA Assistance	Estimates of Unmet Need
Tenant based rental assistance	10
Short-term Rent, Mortgage, and Utility	0
Facility Based Housing (Permanent, short-term or transitional)	12

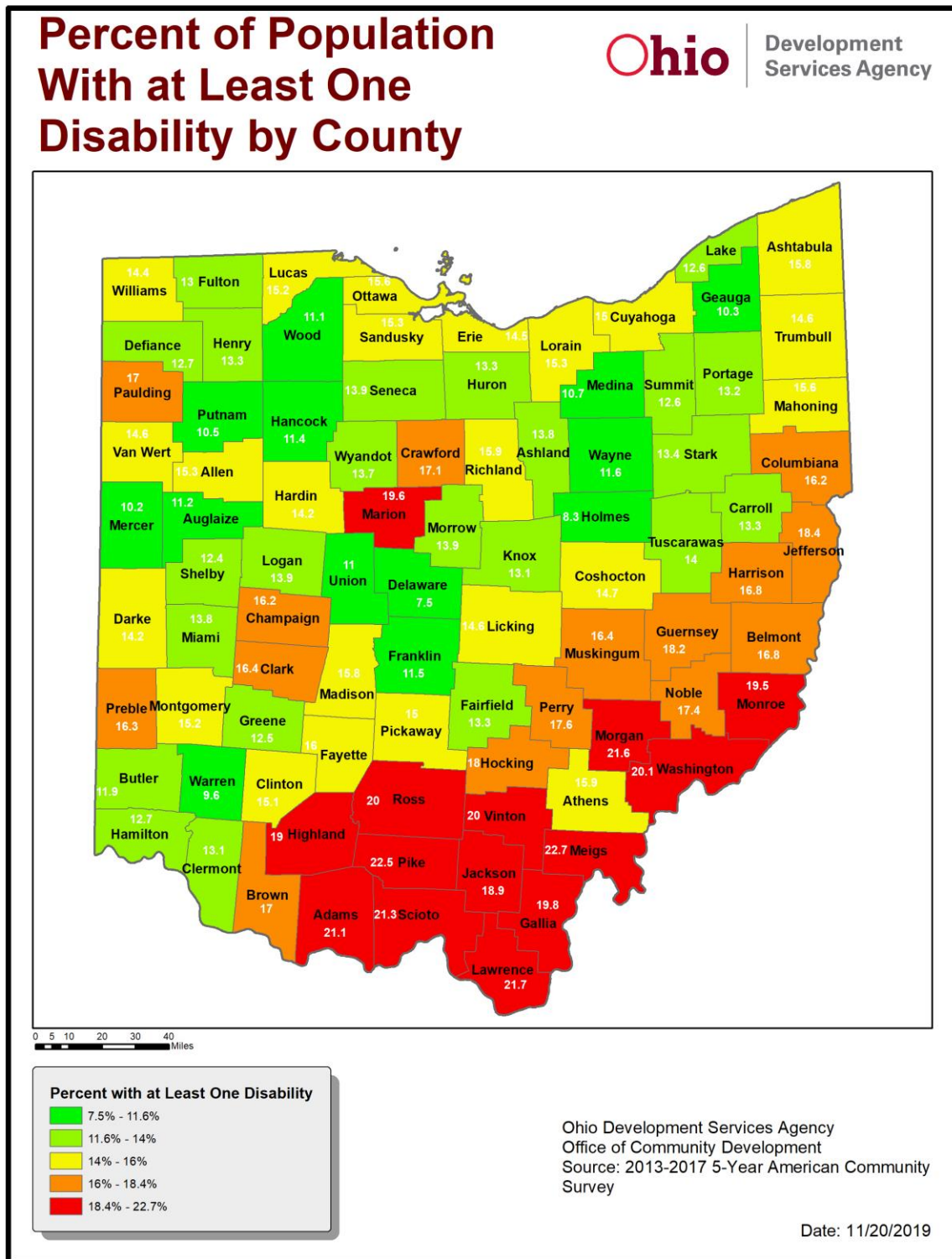
HIV Housing Need Table

Data HOPWA CAPER and HOPWA Beneficiary Verification Worksheet
Source:

Describe the characteristics of special needs populations in your community:

Throughout much of rural Ohio, there are higher rates of persons with disabilities when compared to urban counties. The state’s rural Appalachian region counties have some of the highest rates in the state as reported in the 2013-2017 ACS 5-Year Estimates. Of the 32 Appalachian counties, 29 have disability rates that exceed the 13.8% state average, with Meigs, Pike, Lawrence, Morgan, Scioto, Adams, Washington, Ross, and Vinton counties

above 20%. The following map provides a summary of special needs populations across the state along with these groups' possible needs.



Elderly

The 2013-2017 ACS data indicates 25.1% of persons between the ages of 65 and 75, and 48.3% of persons older than 75 have at least one disability, making the elderly the most impacted subgroup. According to the ACS data, approximately 1.8 million Ohioans are aged 65 or older, representing 16% of the state’s population. Generally, the eastern part of the state has a larger proportion of older adults than other regions.

The Ohio Department of Aging, which serves as Ohio’s designated State unit on Aging, stated in its 2019-2022 State Plan on Aging that Ohio “has 2.5 million residents over the age of 60, and our 60-plus population is growing more than 20 times faster than our overall population. In 2010, only four Ohio counties had populations that were more than 25% age 60-plus. By 2030, only seven counties will be under that threshold. In just 12 years, Ohio will have nine counties where more than one out of every three residents are seniors.” The complete report, located at https://aging.ohio.gov/Portals/0/PDF/State_Plan_19-22.pdf, includes population projections along with goals, objectives and strategies as they relate specifically to elderly with disabilities.

Individuals with Mental Health, Physical and Developmental Disabilities

The table below includes the 2013-2017 ACS list of disabilities with percentages impacting the overall population. The percent of persons with an ambulatory difficulty is the leading disability in the state with 7.6% of the total population reporting an impairment that prevents or impedes walking. A total of 22% of persons older than 65 reported having this disability. The second largest category of disability are persons with independent living difficult, which again impacts the elderly the most with 14.3% of persons older than 65 reporting this disability.

Population Subgroup	Percent with a Disability (2013-2017 ACS)
Percent with a vision difficulty	2.4%
Percent with a self-care difficulty	2.8%
Percent with a hearing difficulty	3.8%
Percent with a cognitive difficulty	5.7%
Percent with an independent living difficulty	6.2%
Percent with an ambulatory difficulty	7.6%

Percent of Persons with a Disability by Type Table

Source: 2013-2017 ACS 5-Year Estimates

The third leading disability reported is cognitive disability, also known as intellectual disability, which includes autism, dementia, Down syndrome and traumatic brain injury. A total of 5.7% of the population reported having a cognitive disability, but unlike the ambulatory and independent living disabilities, cognitive disabilities impact nearly all ages uniformly, excluding the 75 and older population. The needs for people with persons with cognitive difficulty vary as it can be difficult to assess the conditions.

Percent of Persons with Cognitive Difficulty (2013-2017 ACS)	Percent of Total Population of Age Range
State of Ohio	5.7%
Population under 18 years	5.2%
Population 18 to 64 years	5.3%
Population 18 to 64 years - Population 18 to 34 years	4.6%
Population 18 to 64 years - Population 35 to 64 years	5.7%
Population 65 years and over - Population 65 to 74 years	4.9%
Population 65 years and over - Population 75 years and over	12.7%

Percent of Persons with a Cognitive Disability by Age Table

Source: 2013-2017 ACS 5-Year Estimates

Individuals with Mental Health and Addiction Disabilities

Governor DeWine made mental health and addiction awareness a priority and extremely important need across the state when he established the RecoveryOhio initiative. In the 2018 RecoveryOhio Report, Governor DeWine stated that “Ohio is in the midst of public health crisis” with communities statewide feeling the impact of the drug epidemic. The Ohio Department of Health reported in the 2017 Ohio Drug Overdose Data: General Findings report, that despite a nearly 28% reduction in prescription opioid-related deaths, excluding fentanyl, the total number of unintentional overdose deaths in Ohio was 4,854 in 2017, compared to 4,050 in 2016. Treatment options offered by the Ohio Mental Health and Addiction Services that address programs such as youth experiencing serious mental illness and/or addiction will be discussed as part of the Strategic Plan section of the PY 2020 – 2024 Consolidated Plan.

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

In the state of Ohio, the public provided a lot of input on the needs of persons with disabilities through responses to the PY 2020 – 2024 Consolidated Plan Needs Survey, the 2019 Analyses of Impediments from CDBG direct allocation grantees, and reports generated by various state agencies that assist persons with disabilities. The following will include specific housing and supportive needs identified in the surveys and Analyses of Impediments along with the goals and objectives identified in the state agency reports.

Housing Problems for Aging Adults

The share of older adults and older adults living alone in Ohio is increasing. Living alone, combined with decreases in income, puts older adults at a higher risk of housing cost burden, meaning they spend more than 30 percent of their income on housing. Individuals older than 65 are more likely to pay more than 30 percent of their income on rent. Individuals who are cost burdened are at higher risk for eviction, homelessness, and problems paying for routine expenses, such as medical care

Gross Rent as Share of Household Income for Renters by Age of Householder						
Gross Rent as Share of Household Income	Under 35	35 to 44	45 to 54	55 to 64	65 to 74	75 and over
	Percent	Percent	Percent	Percent	Percent	Percent

No cash rent	3.17	4.19	5.41	7.00	7.09	10.28
Less than 10.0%	4.97	5.45	7.13	4.87	4.46	4.18
10.0% to 19.9%	26.55	27.93	28.15	19.96	14.66	12.19
20.0% to 29.9%	24.51	22.23	20.95	21.99	23.24	18.37
30.0% to 39.9%	12.13	12.69	11.58	13.36	18.34	16.23
40.0% to 49.9%	6.97	6.72	5.04	6.28	10.63	9.31
50.0% or more	18.99	18.70	19.01	24.02	20.53	28.33
Zero or negative income	2.71	2.08	2.74	2.53	1.04	1.12
All renters	100.00	100.00	100.00	100.00	100.00	100.00

Gross Rent as Share of Household Income for Renters by Age of Householder Table

Source: IPUMS-USA, University of Minnesota, Analyzed by OHFA

Communities across the state have reported that support services and housing for the elderly remains a need as reported in the PY 2020 – 2024 Consolidated Plan Housing and Community/Economic Development Needs Surveys and 2019 Analyses of Impediments. Interestingly, 26% of all respondents in both the Housing survey and Analyses of Impediments included housing for the elderly as one of the top needs, identifying it as an important issue. The Community/Economic Development Needs Survey specifically asked communities and the public to rank the top five public service needs. Responses indicated that public services for the elderly was “important”, “very important” or “most important” making it second only to need for public services for youth.

The Ohio Department of Aging discusses the elderly’s housing and support services needs in the [2019-2022 State Plan on Aging](#). The following goals and objectives are directly related to the elderly’s housing and support service needs:

GOAL: Ohio’s caregivers have access to resources and services to enable them to continue to provide care for their loved ones.

Objectives

- CAREGIVER SUPPORT: Provide meaningful education and heighten awareness on caregiving issues.
- WORKING CAREGIVERS: Encourage employers’ adoption of best-practice policy reforms that support caregivers in the workplace.
- KINSHIP CARE: Support older adults in kinship situations to better care for themselves and their young loved ones.

GOAL: Enable older Ohioans, persons with disabilities and their caregivers to be active and supported in their homes and communities.

Objectives

- CARE MANAGEMENT: Provide comprehensive person-centered assessment and care services and supports that anticipate and address current and emerging needs as they arise.
- WORKFORCE CAPACITY: Increase and sustain the capacity of the direct care workforce and increase interest in professional and non-professional careers that serve older adults.
- LONG-TERM CARE PLANNING: Advocate for the importance of long-term care planning for older Ohioans to support their choice to age-in-place.
- LIVABLE COMMUNITIES: Heighten awareness and adoption of livable community models in Ohio.

- **TRANSPORTATION:** Participate in alignment efforts to achieve sufficient community transportation options (multi-modal) and a supportive infrastructure for older Ohioans.
- **HOUSING:** Advocate for programs and interventions that support safe and affordable housing and enable older adults and people with disabilities to age in place.
- **HOMELESSNESS:** Create better understanding older adult homelessness and advocate for interventions.
- **EMERGENCY PREPAREDNESS:** Strengthen planning efforts

Individuals with Mental Health, Physical and Developmental Disabilities

The PY 2020 – 2024 Consolidated Plan Housing and Homelessness Needs Surveys and 2019 Analyses of Impediments results included a number of responses that specifically addressed support services and housing for persons with disabilities. Responses received from both the Homelessness and Housing Surveys asking respondents if “housing for physically disabled persons” is a top five need indicated moderate need, with only 24% of Homeless Survey and 22.5% of Housing Survey respondents indicating that this area was one of the greatest needs facing their respective communities. This also applies to the results of the “housing for residents with other special needs,” with a total of 26.2% of Homeless Survey and 27.2% of Housing Survey respondents indicating that this area was one of the greatest needs facing their respective communities.

The 2019 Analyses of Impediments that compiles all of the state’s direct Allocation CDBG grantees Analysis of Impediments identified “lack of affordable/accessible housing for individuals with disabilities” as the fourth greatest need with 51% reporting this as an impediment to fair housing choice.

Individuals with Mental Health and Addiction Disabilities

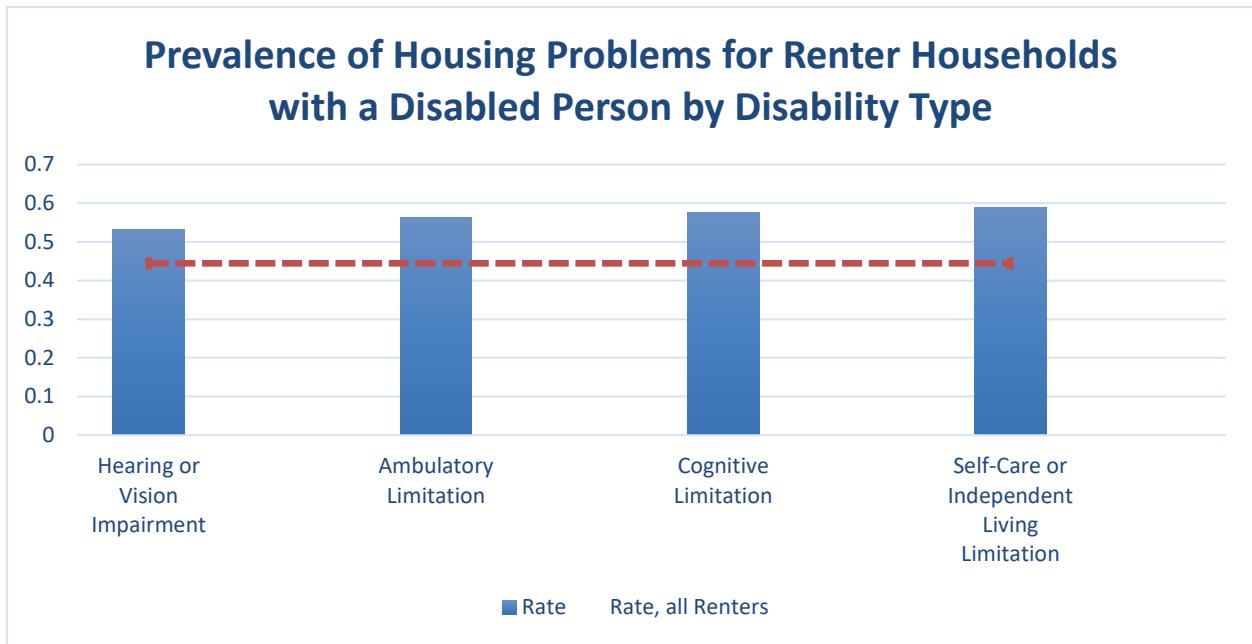
Treatment for persons with alcohol and substance abuse remains an important need across the state. OhioMHAS supports access to treatment options that are proven effective and ensures full access to Ohioans from their homes to inpatient and even jail-based settings. The goals that set forth by RecoveryOhio are as follows:

- Make treatment available to Ohioans in need
- Provide support services for those in recovery and their families
- Offer direction for the state’s prevention and education efforts
- Work with local law enforcement to provide resources to fight illicit drugs at the source.

Housing Problems for Individuals with Disabilities

Individuals with disabilities are at higher risk of experiencing housing problems, defined as having incomplete housing facilities, overcrowding, and cost burden, which is spending more than 30 percent of one’s income on housing. A higher rate of individuals with disabilities experience housing problems than the overall state rate. The rate for all renters with housing problems is 44.46 percent, while the rates for renters with a disability is

substantially higher, according to Comprehensive Housing Affordability Strategy (CHAS) data (2012-2017 estimates).



Prevalence of Housing Problems for Renter Households with a Disabled Person by Disability Type Graph

Source: 2013-2017 ACS 5-Year Estimates Analyzed by OHFA

These housing challenges are substantially higher for lower income individuals with disabilities. Of all those who earn less than 50 percent of the Area Median Income (AMI), more than 70 percent experience housing problems.

Prevalence of Housing Problems for Renter-Occupied Households with a Disabled Person by Disability Type and Income					
	Hearing or Vision Impairment	Ambulatory Limitation	Cognitive Limitation	Self-Care or Independent Living Limitation	Any Disability
Household Income	Rate	Rate	Rate	Rate	Rate
30% AMI or less	73.15%	72.79%	74.26%	73.35%	73.59%
31% to 50% AMI	70.40%	70.69%	73.82%	72.96%	71.09%
51% to 80% AMI	38.03%	39.05%	36.79%	42.50%	36.75%
81% AMI or more	13.23%	13.67%	12.60%	17.22%	11.71%
All renter households	53.16%	56.21%	57.68%	58.80%	54.88%

Prevalence of Housing Problems for Renter-Occupied Households with a Disabled Person by Disability Type and Income Table
Source: 2012 - 2016 CHAS data

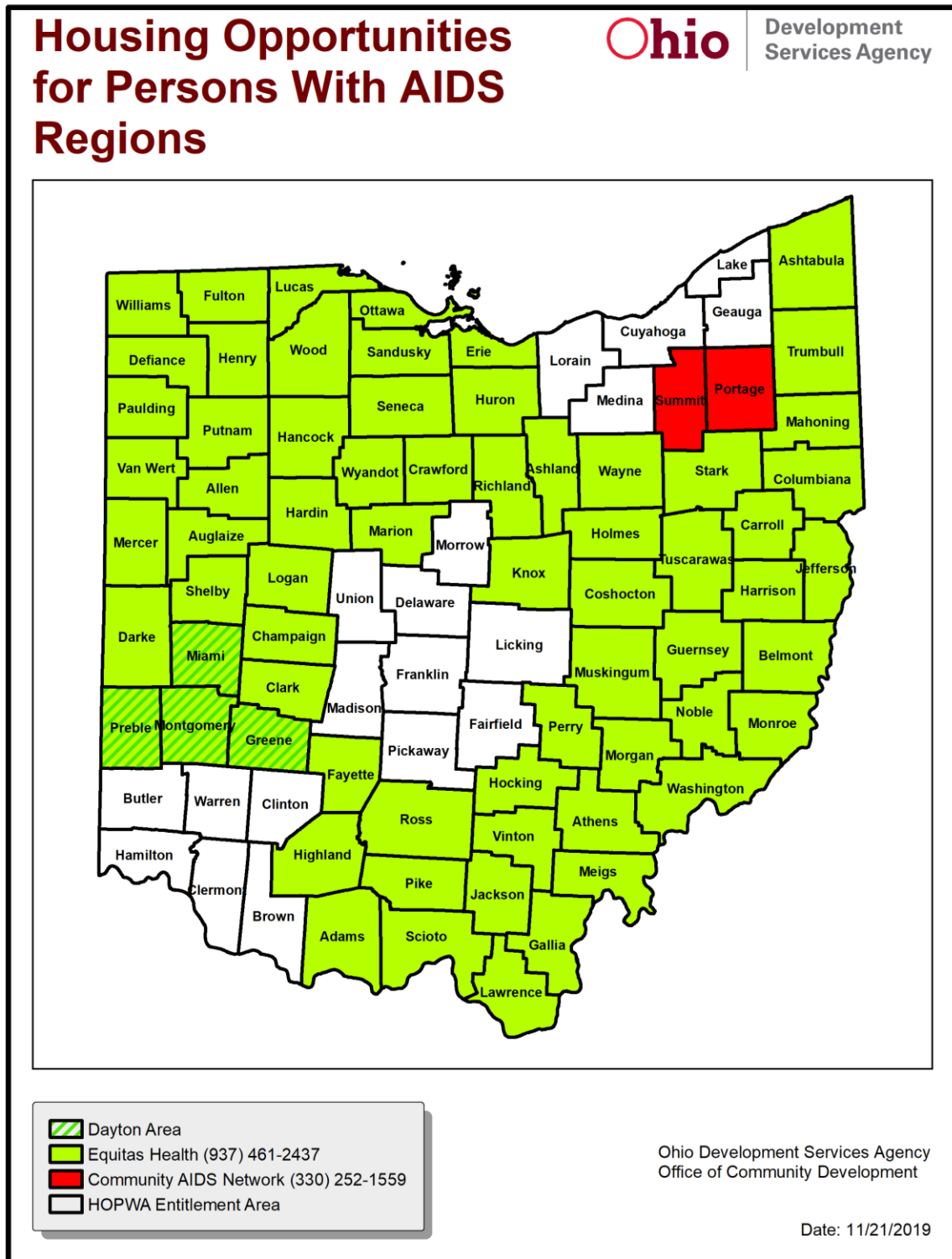
Discuss the size and characteristics of the population with HIV/AIDS and their families within the Eligible Metropolitan Statistical Area:

The Ohio Department of Health reported in its *2018 HIV in Ohio Report*, “there were 989 reported new diagnoses of HIV Infection in the state of Ohio. Eighty-two percent of new diagnoses were male, and 47% of new diagnoses were black/African American. The rate of new diagnoses in black/African Americans was nearly seven times higher than that in whites. Over half (53%) of new diagnoses are between the ages of 20 and 34. Male-to-male sexual contact is the transmission category for 63% of males and heterosexual contact is the transmission for 66% of females. Fifty-eight percent of new diagnoses reside in Cuyahoga (16%), Franklin (23%), or Hamilton (19%). Twenty-five percent of new diagnoses had a late diagnosis (initially diagnosed and progressed to AIDS within 12 months of initial HIV diagnosis or initially diagnosed with AIDS).

As of December 31, 2018, there were 24,130 persons living with diagnosed HIV Infection in the state of Ohio. Slightly over half (52%) of the 24,130 people are living with HIV only, meaning they have not yet progressed to AIDS and slightly under half (48%) have already progressed to AIDS. Persons age 50-54 years have the highest rate of persons living with diagnosed HIV Infection at 493.3/100,000. Whites and black/African Americans each make up 44% of persons living with diagnosed HIV Infection, but the rate for black/African Americans was more than 6 times as high as that for whites. Fifty-six percent of persons living with diagnosed HIV infection in Ohio resided in Cuyahoga (21%), Franklin (22%), or Hamilton (13%) Counties.”

Although the majority of new cases reported are in urban areas, Lawrence County reported new cases at a rate of 10 per 100,000 persons, which is higher than the state’s 8.5 rate and most of the state’s urbanized areas. Other more rural counties reporting rates close to the state average are Clark (7.4) and Greene (7.1) counties, near Dayton, and Erie County (6.7) and Wood County (6.9) which are south of Toledo. The state provides HOPWA

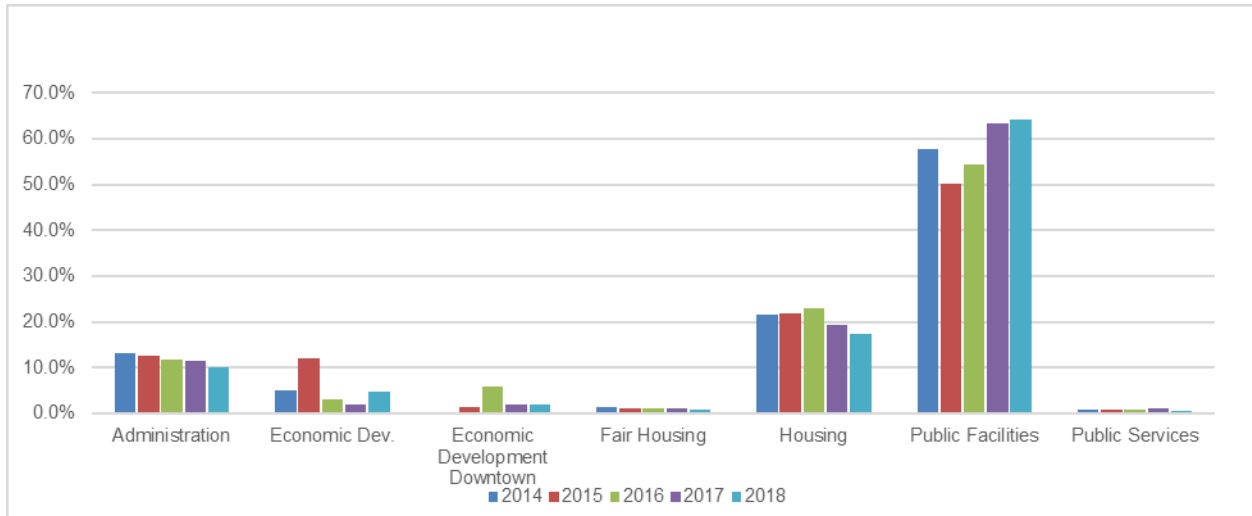
funding to assist 69 counties as indicated in the following map. The state administers Dayton's annual allocation.



NA-50 Non-Housing Community Development Needs - 91.315 (f)

Describe the jurisdiction’s need for Public Facilities:

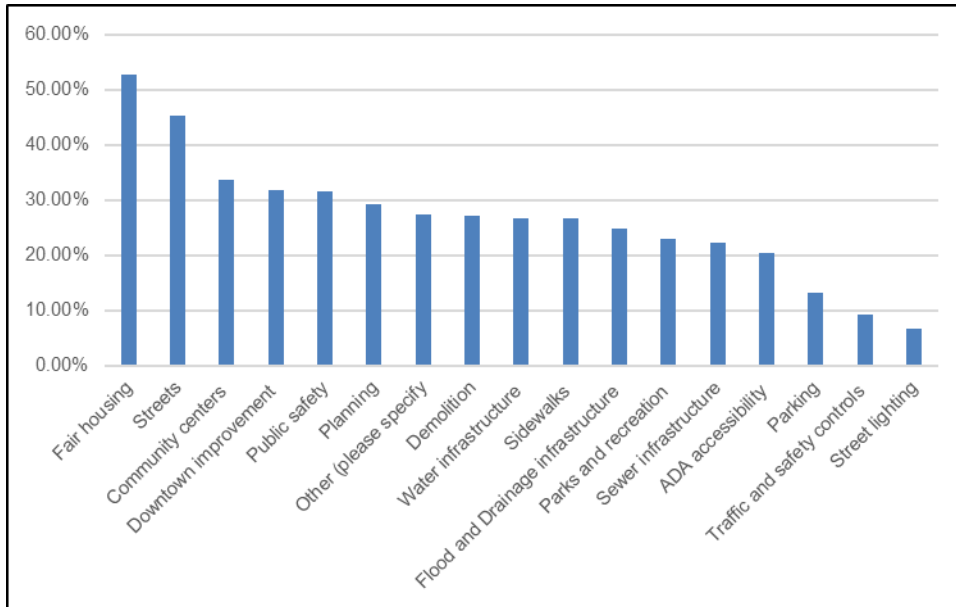
Historically, Ohio had substantial need for public facility improvements, with the majority of CDBG funds provided to local communities specifically for public facility projects. The chart below shows CDBG funds distribution by activity category from PY 2014 to PY 2018. It should be noted that the public facilities category includes public facilities and public improvements. Since determining CDBG non-entitlement communities’ specific public facility needs is difficult, the state required communities to submit Community Development Implementation Strategies (CDIS) to effectively prioritize their communities’ various public facility needs. The CDIS is a tool that helps the state understand local communities’ basic community development needs.



OHIO CDBG Non-Entitlement Percent of Activity Categories Funded by Year Chart

Source: PY 2014 – PY 2018 Ohio CAPER

Development also determined public facility needs from results of the PY 2020-2024 Consolidated Plan Community and Economic Development Needs Survey. Development asked communities statewide to identify their greatest needs. The chart below illustrates the community development needs reported by local communities. The top-ranking public facilities needs identified in the survey were community centers (33.7%), public safety (31.5%), parks and recreation facilities (23%), ADA accessibility (20.5%) and traffic and safety controls (9.1%). Broadband was included as an important public facilities need under the economic development section of the survey and will be discussed further as part of the public improvements section of NA-50 as it ties more directly in with the Ohio Department of Transportation’s infrastructure plans.



Percent of Community Development Survey Results Indicating Activity a Top Five Need Chart

Source: PY 2020 – 2024 Ohio Consolidated Plan Community Development Needs Survey

In addition to the data generated from the Community Development survey, Community Development Implementation Strategy (CDIS) and past performance being used to determine public facilities’ needs, Governor DeWine’s office initiated efforts to improve water quality. The following is one of Governor DeWine’s initiatives that specifically addresses water quality needs as it relates to public facilities, although this initiative also includes public improvements, which will be discussed in the next section.

Water Quality

On November 14, 2019, Governor DeWine unveiled H2Ohio “a comprehensive, data-driven water quality plan to reduce harmful algal blooms, improve wastewater infrastructure, and prevent lead contamination.” The plan addresses the following water quality issues that many rural CDBG non-entitlement communities are facing throughout the state, “reduce phosphorus runoff and prevent algal blooms; improve wastewater infrastructure; replace failing home septic systems; and prevent lead contamination in high-risk daycare centers and schools.” The statewide needs specifically related to public facilities are addressed on the H2Ohio website at <http://h2.ohio.gov/>.

How were these needs determined?

The public facility needs identified above were determined through public input from the PY 2020-2024 Consolidated Plan Community and Economic Development Needs Survey and information received from eligible CDBG grant applicants as part of the CDIS.

H2Ohio developed the water quality needs outlined in the H2Ohio Plan in partnership with many state agencies, particularly Ohio Department of Health (ODH) and the Ohio Environmental Protection Agency (OEPA). As part of H2Ohio’s Needs, the agencies provided information and reports on harmful algal blooms, failing septic systems, nutrient pollution and lead contamination. Links to data and additional information used to determine needs can be accessed from the “Ohio’s Needs” tab on the [H2Ohio](http://h2.ohio.gov/) website.

Describe the jurisdiction’s need for Public Improvements:

Respondents of the PY 2020 – 2024 Consolidated Plan Community and Economic Development Survey identified street improvements as the highest public improvement need at 45.4% followed by downtown improvement

(31.8%), water infrastructure (26.7%), sidewalks (26.7%), flood and drainage infrastructure (24.9%) and sewer infrastructure (22.3%).

In addition to the data generated from the Community and Economic Development survey and CDIS, the following are public improvement needs concerning broadband and resiliency to natural hazards in response to HUD's 2016 request, as well as the public improvement needs outlined in Governor DeWine's H2Ohio initiative.

Broadband

As noted in Federal Register Volume 81, No. 242, issued on December 16, 2016, Rules and Regulations, states are required to address Modernizing HUD's Consolidated Planning to Narrow the Digital Divide. The HUD rule requires states to evaluate broadband access and service for low- and moderate-income persons.

Governor DeWine indicated that his administration is committed to ensuring broadband is a part of the state's overall infrastructure strategy. Lt. Governor Jon Husted, who serves as the Director of InnovateOhio, stated that "expanding access to and quality of broadband in our state is a quality of life issue, an economic issue, and a health and safety issue, which is why our administration is determined to get our strategy right." The results from the report will help guide the state on how to best expand broadband to underserved areas of the state.

As reported by the Governor's Office and based on currently available information "it is believed that 300,000 households in Ohio, representing around 1 million Ohioans, lack access to high-speed internet". The following map provided by Connect Ohio identifies the areas of the state, primarily rural, currently unserved by broadband, defined as 25 Mbps downstream and 3 Mbps upstream. A large portion of the southeastern and northwestern areas remain underserved.

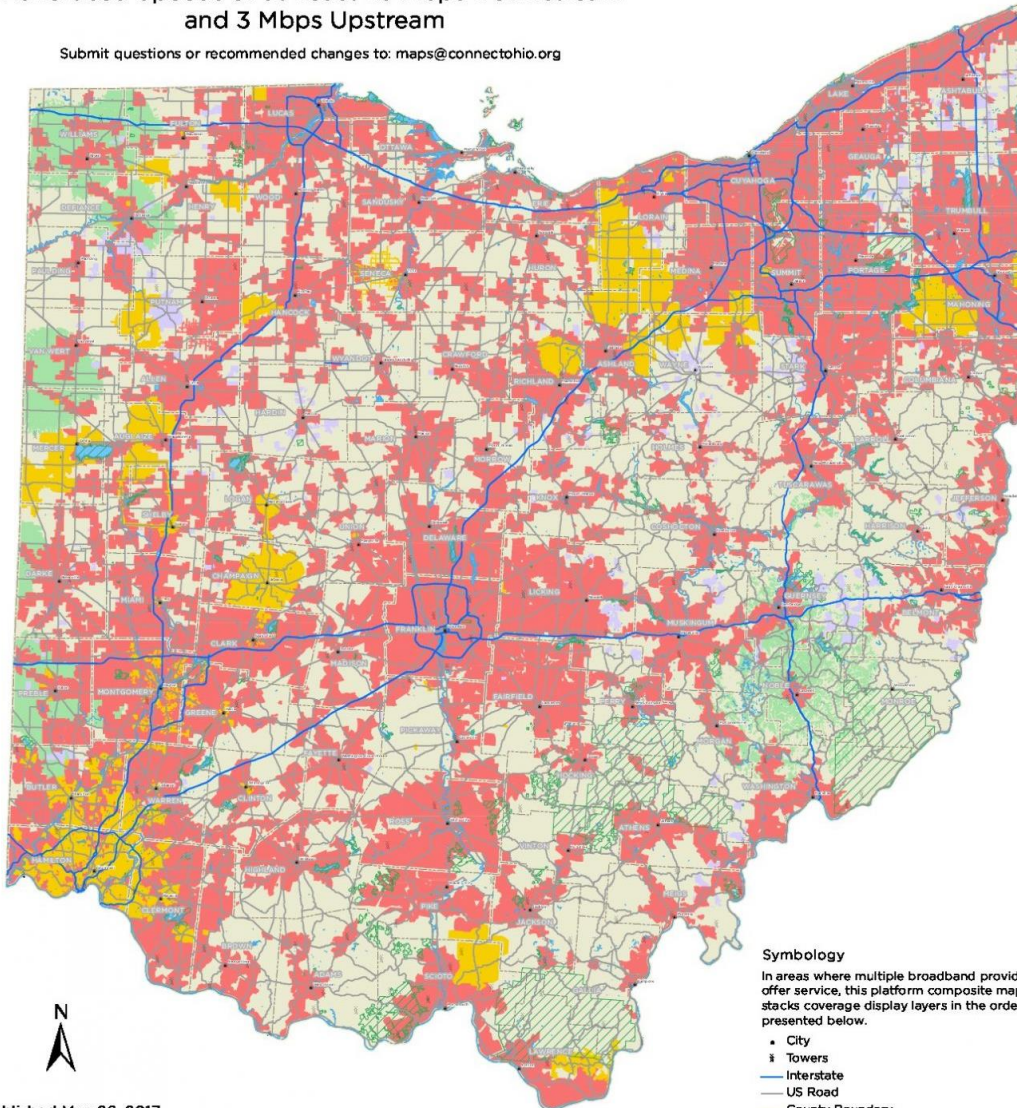
In addition to the needs identified through information provided by Connect Ohio and InnovateOhio, the state received feedback from local communities indicating that broadband access is an important economic development need. On the PY 2020 – 2024 Consolidated Plan Community and Economic Development Survey, 23 communities identified the lack of "available and affordable access to broadband" internet as one of the top economic development challenges facing their respective communities.

Broadband Service Inventory for the State of Ohio



Advertised Speeds of at Least 25 Mbps Downstream
and 3 Mbps Upstream

Submit questions or recommended changes to: maps@connectohio.org



Published May 26, 2017



This map represents areas of broadband service availability determined by ongoing, in-depth technical analysis of provider networks and accommodations for the impact of external factors on service quality. Mobile and satellite broadband services may also be available.

Symbology

In areas where multiple broadband providers offer service, this platform composite map stacks coverage display layers in the order presented below.

- City
- ⊞ Towers
- Interstate
- US Road
- County Boundary
- Water
- National and State Lands
- Fiber Broadband Available
- Cable Broadband Available
- DSL Broadband Available
- Fixed Wireless Broadband Available
- Unserved Areas

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Water Quality

As noted in the previous public facilities' needs, Governor DeWine is committed to improving water quality through the H2Ohio plan. Reducing phosphorus runoff, preventing algal blooms, improving wastewater infrastructure, replacing failing home septic systems and preventing lead contamination in high-risk daycare

centers and schools are all important public improvements needs. The statewide needs that specifically relate to public improvements are addressed on the H2Ohio website at <http://h2.ohio.gov/>.

Resiliency to Natural Hazards

As noted in Federal Register Volume 81, No. 242, issued on December 16, 2016, Rules and Regulations, states are required to address Modernizing HUD's Consolidated Planning to Increase Resilience to Natural Hazards. The HUD rule requires states to report on the "vulnerability of housing occupied by low- and moderate-income households to natural hazard risks, many of which may be increasing due to climate change." The following actions have been taken by various agencies in the state to address the state's disaster resiliency needs.

The Ohio Emergency Management Agency's (OEMA) [Emergency Operations Plan](#) (EOP) establishes a framework through which state agencies and other designated non-state agencies assist local jurisdictions to respond to and recover from disasters that affect the health, safety, and welfare of Ohio's citizens. The Ohio EOP follows the Emergency Support Function structure as outlined in the U.S. Department of Homeland Security's National Response Framework and incorporates the National Incident Management System.

The 2018 Emergency Operations Plan "is structured on 15 Emergency Support Functions (ESF) that correspond to the format of the National Response Framework. Each ESF is headed by a Primary Agency that coordinates activity under that function. The Primary Agency is supported by a number of Support Agencies, which are selected based upon their legislative authorities, knowledge, resources, and capabilities. The ESF is the primary mechanism through which state assistance to local governments is managed during emergencies. State assistance can include the allocation of state resources and technical assistance and the coordination of federal, interstate, intra-state, local government, and non-government agencies in response to emergency events or incidents.

The ESFs detail the roles and responsibilities of state, federal and other public and private agencies that are charged with carrying-out functional missions to assist local jurisdictions in response to emergency events or incidents. Each primary and support agency has internal plans and procedures that detail how it will address responsibilities during state-level emergencies. Support agencies are not required to address any emergency responsibilities that are contrary to the laws or policies that govern their organizations. Primary and support agencies will be activated and notified for Ohio Emergency Operations Center (EOC) activation by Ohio EMA. Activation will be based upon the requirements for emergency response and recovery and the agencies that are activated will vary depending on those requirements."

How were these needs determined?

The broadband needs identified in InnovateOhio's Statewide Broadband Report were produced as part of a Request for Information issued on June 20, 2019, that sought input from various stakeholders and the public. Various state agencies, including Ohio EPA and Ohio Department of Health, identified H2Ohio's needs on the [H2Ohio](#) website, which includes information on issues impacting water quality statewide. The link to the Ohio EPA's site provides the list of community and nontransient noncommunity public water systems that are known to contain lead.

As part of the OEMA Emergency Operations Committee Partners and Stakeholders Quarterly Meetings, which Development serves on, members developed the resiliency to natural hazards needs identified in the Emergency Operations Plan. The quarterly committee specifically addresses statewide disaster recovery in order to address how housing assistance to low- and moderate-income persons impacted by federally designated disasters will be provided. The Housing Recovery Strategy section of the plan, located at https://www.ema.ohio.gov/Documents/Ohio_EOP/EOP_Overview/ESF14_tabD.pdf, includes the roles of various providers and how assistance will be provided during recovery efforts. As stated in the report, Development and OHFA's roles are to "address pre- and post-disaster housing issues and coordinate and facilitate the delivery of local, state and federal resources and activities to assist disaster survivors in the cleanup, temporary repair, rehabilitation, and reconstruction of destroyed or damaged housing. Assist disaster survivors in identifying short- and long-term housing options. Work with local governments on the development of other permanent housing

solutions.” Development also serves on the OEMA State Hazard Mitigation Team that reviews projects to ensure that specific hazards are addressed, such as flooding.

In addition to the needs developed by the OEMA Emergency Operations Committee Partners and Stakeholders Quarterly Meetings and OEMA State Hazard Mitigation Team, reviewing historical data can be useful in determining natural hazard resiliency needs. The following chart provides the list of federally declared disasters over the past 10 years along with impacted counties, type of disaster, incident type, and funds provided. Since 2008, the total number of counties in the state that experienced five or more federally declared disasters were located in CDBG non-entitlement Appalachian counties. This part of the state has many LMI communities, with Athens County having a 54.1% LMI population.

DISASTER DECLARATION NUMBER	DATE DECLARED	FEDERAL DISASTER PROGRAMS	INCIDENT TYPE	COUNTIES DECLARED	FUNDS PROVIDED
EM-3286	24-Apr-08	PA	Snow	Ashtabula, Brown, Clermont, Clinton, Crawford, Delaware, Fairfield, Franklin, Geauga, Greene, Hardin, Huron, Lake, Morrow, Richland, Union and Wyandot	\$9,481,809 (P) est.
DR-1805	24-Oct-08	PA/MIT	Wind Event	Ashland, Brown, Butler, Carroll, Champaign, Clark, Clermont, Clinton, Coshocton, Delaware, Fairfield, Franklin, Greene, Guernsey, Hamilton, Harrison, Highland, Hocking, Holmes, Knox, Licking, Madison, Miami, Montgomery, Morrow, Perry, Pickaway, Preble, Shelby, Summit, Tuscarawas, Union, and Warren	\$47,968,724 (P) \$6,507,249 (M)
DR-4002	13-Jul-11	PA/MIT	Severe storms, landslides	Adams, Athens, Belmont, Brown, Clermont, Gallia, Guernsey, Hamilton, Hocking, Jackson, Jefferson, Lawrence, Meigs, Monroe, Morgan, Noble, Pike, Ross, Scioto, Vinton, Washington	\$45.8 Million (PA) \$5,046,137 (M)
EM-3346	30-Jun-12	PA (for Direct Assistance only)	Severe storms,	All 88 counties	PA was for Direct Assistance only, no financial assistance
DR-4077	20-Aug-12	PA/MIT	straight-line winds (derecho)	Adams, Allen, Athens, Auglaize, Belmont, Champaign, Clark, Coshocton, Fairfield, Franklin, Gallia, Guernsey, Hancock, Hardin, Harrison, Highland, Hocking, Jackson, Knox, Lawrence, Licking, Logan, Meigs, Miami, Monroe, Morgan, Morrow, Muskingum, Noble, Paulding, Perry, Pickaway, Pike, Putnam, Shelby, Van Wert, Vinton, Washington, Wyandot	Initial Estimates of: \$22.0 Million (PA) est. \$3.4 Million (M) est.

DR-4098	3-Jan-13	PA/MIT	Severe storms, flooding	Ashtabula, Cuyahoga	Initial Estimates of: \$17.8 Million (PA) est. \$2.7 Million (M) est.
DR-4360	17-Apr-18	PA/MIT	Severe storms, flooding, landslides	Adams, Athens, Belmont, Brown, Columbiana, Coshocton, Gallia, Hamilton, Harrison, Jackson, Jefferson, Lawrence, Meigs, Monroe, Morgan, Muskingum, Noble, Perry, Pike, Scioto, Vinton, Washington	Initial Estimates of: \$65 Million (PA) est. \$9.75 Million (M) est.
DR-4424	8-Apr-19	PA/MIT	Severe storms, flooding, landslides	Adams, Athens, Belmont, Brown, Gallia, Guernsey, Hocking, Jackson, Jefferson, Lawrence, Meigs, Monroe, Morgan, Muskingum, Noble, Perry, Pike, Ross, Scioto, Vinton, Washington	Initial estimates of:
DR-4447	18-Jun-19	IA/PA/MIT	Severe storms, tornados, straight-line winds, flooding, landslides	Greene, Mercer, Montgomery (IA/PA/MIT); Auglaize, Darke, Hocking, Mahoning, Miami, Muskingum, Perry, Pickaway (IA/MIT); Columbiana (PA/MIT)	Initial estimates of:

Declared Disaster Summary Table

Source: Ohio EMA

Describe the jurisdiction’s need for Public Services:

The PY2020 – PY 2024 Consolidated Plan Community and Economic Development Survey specifically asked stakeholders and the public to rank public services for their respective communities. The following table includes the results from the survey with services for youth programs receiving the most responses categorized as “important,” “very important,” or “most important” followed by services for the elderly and homeless and domestic violence services. Interestingly, medical and nutrition received the most responses (74) that indicated that this need was the most important.

	1 – NOT IMPORTANT	2 – SOMEWHAT IMPORTANT	3 – IMPORTANT	4 – VERY IMPORTANT	5 – MOST IMPORTANT	WEIGHTED AVERAGE
Public services for the disabled	20.5%	25.3%	20.5%	18.0%	15.8%	
	56	69	56	49	43	2.83
Services for the elderly	11.7%	22.7%	27.1%	26.4%	12.1%	
	32	62	74	72	33	3.04
Youth programs and services	18.0%	15.4%	21.3%	26.4%	19.1%	
	49	42	58	72	52	3.13
Homeless and domestic violence services	19.4%	20.2%	19.4%	15.0%	26.0%	
	53	55	53	41	71	3.08

Medical and nutrition programs	30.4%	16.5%	11.7%	14.3%	27.1%	
	83	45	32	39	74	2.91

Support Services Summary Table

Another method for determining the level of public service need for the state’s CDBG non-entitlement areas is by examining grant activity data since the last Consolidated Plan. Based on the chart included in the Public Facilities section titled “CDBG Percent of Activity Categories Funded by Year” relatively consistent need remains among CDBG non-entitlement communities for public services since the PY 2015 – PY 2019 Consolidated Plan. Generally, CDBG public service activities have accounted for approximately 1% of the state’s total CDBG annual allocation.

How were these needs determined?

The public service needs were determined as part of the PY 2020 – 2024 Consolidated Plan Community and Economic Development Needs Survey, past funded projects and reviewing the CDIS that requires documenting public service needs by grant applicants when submitting annual CDBG applications.

Housing Market Analysis

MA-05 Overview

Housing Market Analysis Overview:

The following excerpt from the 2019 OHFA Needs Assessment provides a summary of the current housing stock in Ohio. “More than one in five homes in Ohio were built before 1940, including a third of the state’s vacant housing. More than 1% of housing units and over 2% of renter-occupied units do not have complete kitchen or plumbing facilities. Over 100,000 renter occupied units, or 6.9%, are rated as inadequate, mostly due to lack of upkeep causing issues such as leaks, holes, large cracks, peeling paint, broken plaster, and rat infestation. One-third of renter-occupied units reported water leakage from outside, and 23% reported blown fuses or breakers in the prior three months. Similarly, 1.3% of households, including 2.4% of renter-occupied households, are living in overcrowded conditions, meaning there are more household members than there are rooms.

For the first time, state-level data from the American Housing Survey provide insights on the quality of Ohio’s housing stock. Over 285,000 renter households (18%) are considered by the U.S. Department of Housing and Urban Development (HUD) to have Worst Case Housing Needs, meaning they are very low-income, do not have a housing subsidy and are severely cost burdened and/or live in severely inadequate housing.

These conditions may be due to the fact that the housing market is historically tight in Ohio. While over 545,000 housing units are vacant, representing 11% of the state’s housing stock, only 29% of these units are available for sale or rent. Quarterly estimates of owner and rental vacancy from the U.S. Census Bureau are both near their lowest levels on record, suggesting it is challenging for individuals to locate decent available housing.”

Part Two of the 2019 OHFA Housing Needs Assessment focuses specifically on housing stock and occupancy, the housing market, housing costs and affordability and multifamily affordable housing development. An examination of Part Two of the 2019 OHFA Needs Assessment will be an important element of the Market Analysis section of the Consolidated Plan as the OHFA report utilizes a wide range of state data to identify the scale and scope of the state’s housing challenges while highlighting key trends.

MA-10 Number of Housing Units – 91.310(a)

Introduction

Ohio has more than 5.1 million total housing units, with an 10.5 percent vacancy rate. In the Appalachian region, the vacancy rate is 12.5 percent. More than 3 million individuals, 66.1 percent, in the state own their own home and more than 1.5 million, 33.9 percent, rent housing. Nearly 71.3 percent of the population owns their own home in Ohio's Appalachian region, while 28.7 percent rent housing.

Since the last Five-Year Consolidated Plan was prepared in 2015, the number of housing units by property type have remained relatively unchanged. One-unit detached structures remain the most dominant housing type, which still represent 68% of all structures. A total of 14% of all units are multi-family units that consist of five or more units, the same percentage as in 2011.

Since 2011, Ohio has added only 21,209 housing units, an increase of a less than 1%. The relatively small increase in total housing units is nearly identical to less than 1% of population growth as reported on Table 5.

All residential properties by number of units

Property Type	Number	%
1-unit detached structure	3,520,412	68%
1-unit, attached structure	232,132	5%
2-4 units	457,122	9%
5-19 units	456,600	9%
20 or more units	274,261	5%
Mobile Home, boat, RV, van, etc.	200,375	4%
Total	5,140,902	100%

Residential Properties by Unit Number Table

Data Source: 2011-2015 ACS

Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	4,231	0%	46,805	3%
1 bedroom	44,760	1%	359,296	23%
2 bedrooms	519,705	17%	639,199	41%
3 or more bedrooms	2,471,748	81%	499,340	32%
Total	3,040,444	99%	1,544,640	99%

Unit Size by Tenure Table

Data Source: 2011-2015 ACS

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

Single-unit, detached structures remain the largest number of housing units targeted in Ohio through Development and OHFA programs. They account for 68% of all housing units, with multi-family properties (properties with five or more units) the second largest group. Although homeownership decreased between 2011 and 2015 from 68.6% to 66.3%, representing a nearly 2.2% decrease in only five years, assistance for this housing type remains important.

The programs established by Development and OHFA that utilize state and federal resources specifically address the housing needs across the state. The following Development programs provide affordable housing and improve housing conditions across the state:

- The [Community Housing Impact and Preservation Program \(CHIP\)](#) provides funding for a flexible, community-wide approach to improve and provide affordable housing for low- and moderate-income people, and strengthen neighborhoods through community collaboration. The program goals are achieved through project activities such as private owner rehabilitation; rental rehabilitation; homeownership; home repair; new housing construction through Habitat for Humanity; homelessness prevention, and tenant-based rental assistance. The program is funded with CDBG, HOME and OHTF funds.
- [The Housing Assistance Grant Program](#) promotes affordable housing opportunities and improves housing conditions through emergency home repair and limited down payment assistance for low- and moderate-income citizens. Grant funds are provided through the Ohio Housing Trust Fund. Eligible applicants include nonprofit organizations.
- [The Homeless Crisis Response Program](#) prevents homelessness for low- and moderate-income individuals and families, provides for emergency shelter operations, and helps to rapidly move persons from emergency shelter into permanent housing. The program is funded through the federal Emergency Solutions Grant (ESG) and the Ohio Housing Trust Fund. Grant funds for homeless prevention and rapid rehousing are awarded to state-appointed service providers on a regional basis.
- [The Housing Opportunities for Persons with AIDS](#) funds organizations to assist with meeting the housing and supportive service needs of low- and moderate-income persons with AIDS or HIV-related diseases. Nonprofit organizations and units of local government are eligible to apply for HOPWA grant funds.
- [The Supportive Housing Program](#) provides funding for operations (and limited funding for services) in permanent supportive housing and facility-based transitional housing programs for low- and moderate-income citizens. Qualified individual nonprofit agencies are eligible to apply for grant funding provided through the Ohio Housing Trust Fund.

The following OHFA programs provide affordable housing and improve housing conditions across the state:

- The [Housing Development Assistance Programs \(HDAP\)](#) administered by OHFA provides grants and loans for the development and preservation of affordable housing. Awarded as soft funding, HDAP resources enable developers and owners of affordable housing to serve households at or below 50% of Area Median Income (AMI). HDAP funding comes from HOME, NHTF and OHTF funding sources.
- OHFA also administers the [Low-Income Housing Tax Credit \(LIHTC\)](#) program, a tax incentive program designed to increase the supply of quality, affordable rental housing by helping developers offset the costs of rental housing developments for individuals with low- to moderate-income. This program has been the largest driver of the production of new affordable housing in the state and nation over the past several years. Since 1987, OHFA has used the HTC program to facilitate the development of over 100,000 affordable rental housing units in Ohio.

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

The following tables provide the federal housing assistance type for the state and HOME Non-Participating Jurisdictions (HOME Non PJs) with the year in which the contract expires and the total number of units associated with the contract. Nearly 65% of the statewide Section 8 housing assistance contracts and 62% of the HOME Non-PJ Section 8 contracts are expiring at the end of federal fiscal year 2024.

Federal Housing Assistance Program	2019	2020	2021	2022	2023	2024
Other S8 New	76	1,314	754	850	939	1,353
Other S8 Rehab			22	381	1,552	551
PAC 202/811		43				
PRAC 202/811	164	7,090	1,085			
S8 FmHA		371	169	366	107	184
S8 Loan Mgmt	215	1,156	1,159	934	1,582	2,442
S8 Preservation			270			
S8 Prop. Disp.	102	223	13	105	402	287

S8 State Agency		56	496	336	586	724
Sec. 202	159	466	675	630	554	174
Totals	716	10,719	4,643	3,602	5,722	5,715

Total Number of Statewide Federal Housing Assistance Units Expiring 2019 – 2024 Table

Source: HUD Multifamily Assistance & Section 8 Database
https://www.hud.gov/program_offices/housing/mfh/exp/mfhdiscl

Total Number of HOME Non-PJ Federal Housing Assistance Units Expiring 2019 - 2024

Federal Housing Assistance Program	2019	2020	2021	2022	2023	2024
Other S8 New		488	279	564	266	530
Other S8 Rehab			12			53
PRAC 202/811	114	2,515	616			
S8 FmHA		371	169	366	107	184
S8 Loan Mgmt	80	293	625	269	503	937
S8 State Agency		56	168	179	193	318
Sec. 202	114	242	134	317	191	84
Totals	308	3,965	2,003	1,695	1,260	2,106

Total Number of HOME Non-PJ Federal Housing Assistance Units Expiring 2019 – 2024 Table

Source: HUD Multifamily Assistance & Section 8 Database
https://www.hud.gov/program_offices/housing/mfh/exp/mfhdiscl

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

Based on population growth and unit production from 2011 to 2015, a need remains for both owner and rental housing statewide. As reported in the 2019 OHFA Needs Assessment, “Over two-thirds of Ohio householders (67%) own their homes, which is above the national average of 64%. Homeownership fell in Ohio and the United States from 2005 to 2015, but has since stabilized, and appears to be on the rise. Ohio’s foreclosure rate (0.7%), 90-day delinquency rate (2%) and negative equity share (5%) in December 2018 were all at record low levels, having fallen precipitously from the height of the recession.

Yet, Ohio’s housing market faces continued challenges of limited and aging stock, and low vacancy rates. Since 2010 Ohio has added only 73,969 housing units, a net increase of 1.4%. Much of this growth has happened in suburban areas (+1.7%), while Ohio’s urban cores have seen housing stock decline (–1.1%).”

Describe the need for specific types of housing:

As noted in the Needs Assessment, there is a statewide need for housing rehabilitation and repair in order to address deficiencies in existing rental and homeowner housing. In addition, it has been identified through the Needs Survey that there is a need for the construction of rental units and rental assistance. The largest sub-groups of the population that have been determined to be in need of affordable rental housing units are elderly households and small related households, which represent a large proportion of the total renter population.

MA-15 Cost of Housing – 91.310(a)

Introduction

One of the indicators of housing cost and affordability is the amount households pay for gross rents and mortgages as a percentage of their income. The U.S. Department of Housing and Urban Development’s policy states households are cost burdened if they are paying more than 30% of their income for housing, including utility costs.

As reported in the Needs Assessment, housing cost burden greater than 30% of income for 0-100% AMI households remains the greatest housing problem impacting renters (39.9%) and owners (14.6%). The purpose of the Housing Market Analysis is to describe the state’s current housing supply and demand over the last five years by analyzing the current housing, housing cost and housing condition. The tables listed below include housing cost, rent paid, housing affordability, and monthly rent for all areas in the state.

The median gross rent per month in Ohio is \$764 and \$662 in the Appalachian region. Table 8 illustrates the median gross rent for housing units in the state. Renters in the state on average allocate 28.6 percent of their household income to housing.

The median home value in Ohio is \$135,100 compared to the national median value of \$204,900. The median monthly homeowners’ cost in the state is \$1,247. The monthly costs calculation includes mortgage, real estate taxes, various insurances, utilities, fuels, mobile home costs, and condominium fees. On average, owners’ costs comprise 19.9 percent of a household’s monthly income.

Households without a mortgage generally pay a lower percentage of their household income toward housing. Overall, 76.1 percent of households without a mortgage spend less than 20 percent of their monthly income for housing. However, 52.1 percent of the state’s households with a mortgage spend less than 20 percent of their monthly income for housing.

Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	134,500	129,900	(3%)
Median Contract Rent	519	577	11%

Cost of Housing Table

Data Source: 2005-2009 ACS (Base Year), 2011-2015 ACS (Most Recent Year)

Rent Paid	Number	%
Less than \$500	589,791	38.2%
\$500-999	831,129	53.8%
\$1,000-1,499	89,805	5.8%
\$1,500-1,999	18,386	1.2%
\$2,000 or more	15,529	1.0%
Total	1,544,640	100.0%

Rent Paid Table

Data Source: 2011-2015 ACS

Housing Affordability

% Units affordable to Households earning	Renter	Owner
30% HAMFI	151,355	No Data
50% HAMFI	561,405	318,480
80% HAMFI	1,086,140	837,285
100% HAMFI	No Data	1,192,465

% Units affordable to Households earning	Renter	Owner
<i>Total</i>	<i>1,798,900</i>	<i>2,348,230</i>

Housing Affordability Table

Data Source: 2011-2015 CHAS

Is there sufficient housing for households at all income levels?

As discussed previously, the total number of renter households in the state increased from 31.3% of households as reported in the 2007-2011 CHAS to 33.7% of all renters as reported in the 2011-2015 CHAS. On the following page, the gross median rents significantly increased for most of the state’s southeastern counties between 2000 and 2015. Based on the percent increase in gross rents, the assumption is a shortage of both homeowner and rental units exists, particularly affordable units for low- and moderate-income persons.

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

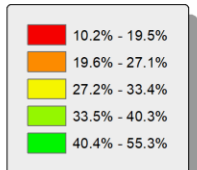
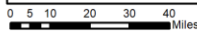
In 2015, when Development prepared the last Consolidated Plan, the state saw a significant increase in the cost of living with median home values increasing by 35% and median contract rent increasing by 28%. Interestingly, the data reported in the 2011-2015 ACS included in the table above titled “Cost of Housing Table” indicates a statewide decrease of nearly 3% in median home value from 2009 to 2015, with an 11% increase in the median gross rent.

It appears that a comparison of the 2000 US Census data with the 2011-2015 ACS data by county will help to better identify the counties and regions of the state that experiencing the greatest rates of change regarding median gross rents and median home value. The following maps show percentage change of median home value and median gross rent. As illustrated in the maps, southeastern and eastern Ohio experienced higher than average rates of change for both home value and rent. This could possibly be attributed to the shale natural gas boom the region experienced recently.

Percent of Median Home Value Change by County 2000 - 2015



Development Services Agency



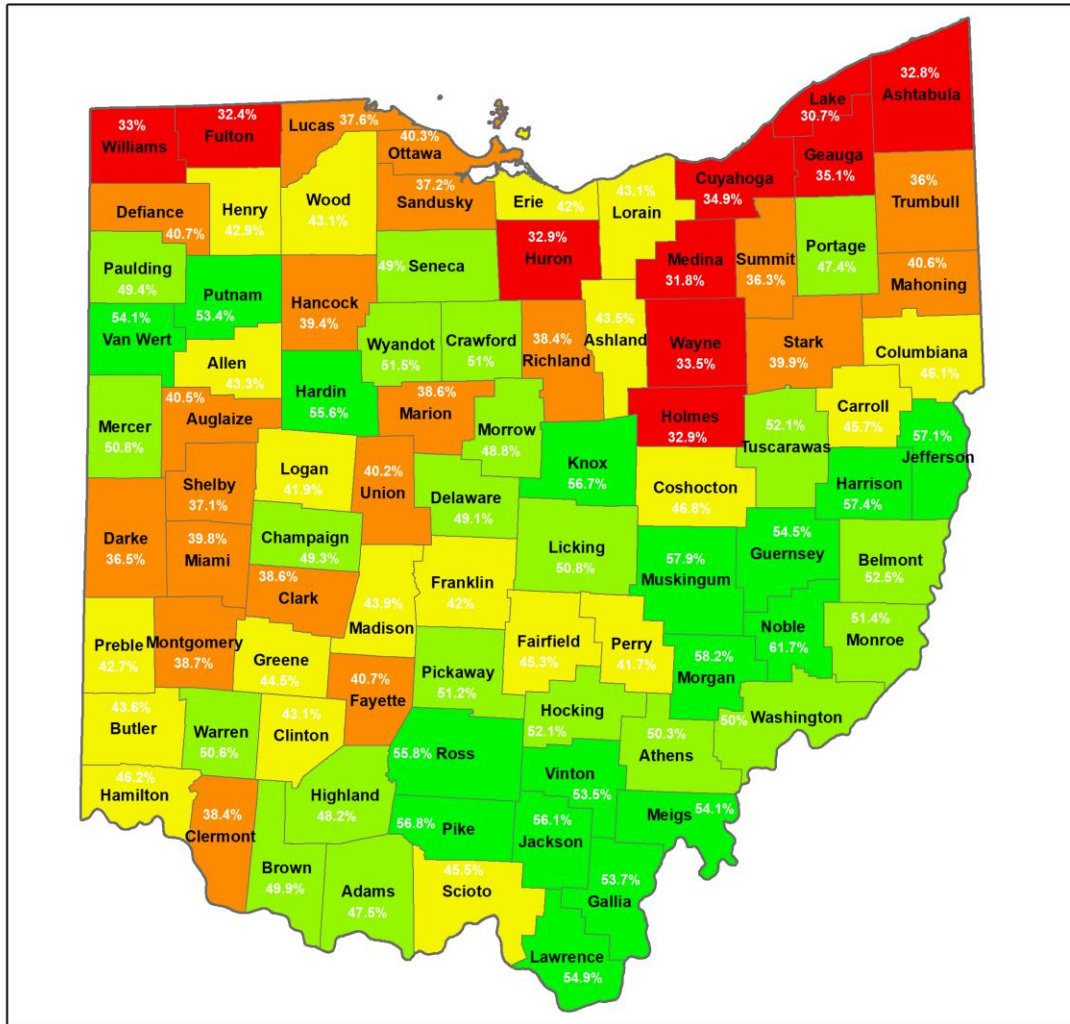
Ohio Development Services Agency
Office of Community Development
Source: 2000 US Census &
2005-2009 5-Year American Community
Survey

Date: 11/27/2019

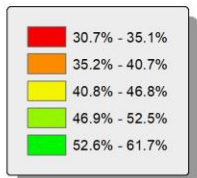
Percent of Median Gross Rent Change by County 2000 - 2015



Development Services Agency



0 5 10 20 30 40 Miles



Ohio Development Services Agency
Office of Community Development
Source: 2000 US Census &
2005-2009 5-Year American Community
Survey

Date: 11/27/2019

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

The National Low Income Housing Coalition's (NLIHC) *Out of Reach 2019* report states that a household would need an annual income of \$32,728 to afford a two-bedroom unit at Ohio's average fair market rent (FMR) of \$818. For non-metropolitan areas, FMR for a two-bedroom unit averages \$704. An individual making minimum wage would have to work 74 hours per week to rent a two-bedroom unit at FMR.

Out of Ohio's 88 counties, 41 have FMR that exceeds \$704 a month for a two-bedroom unit, with 17 exceeding \$818 per month. 47 counties have an average FMR of \$704 or lower per month for a two-bedroom unit.

The following maps provide a comparison of the 2018 HOME Fair Market Rents (FMR) released as part of the 2013-2017 5-Year Median Gross rents by total number of bedrooms and county. As stated in 24 CFR § 888.113, "FMRs are set at the 40th percentile rent, the dollar amount below which the rent for 40% of standard quality rental housing units fall within the FMR area. The 40th percentile rent is drawn from the distribution of rents of all units within the FMR area occupied by recent movers. Adjustments are made to exclude public housing units, newly built units and substandard units." The median rent would be the 50th percentile. There have been some FMR areas designated as 50th percentile regions as set forth in [24 CFR §982.503\(e\)](#). In the 50th percentile regions the Fair Market Rent is the median.

As illustrated in all three maps that compare 2018 HOME FMR's to 2017 5-Year ACS gross median rent for one-, two- and three-bedroom units, there appears to be a higher percentage of counties in southeastern Ohio with higher FMR as compared to the 2017 5-Year ACS. The assumption is households in this part of the state must provide higher rents based on the FMR than is reported in the ACS to be eligible for the following: Housing Choice Voucher program; to determine initial renewal rents for some expiring project-based Section 8 contracts; to determine initial rents for housing assistance payment (HAP) contracts in the Moderate Rehabilitation Single Room Occupancy program (Mod Rehab); rent ceilings for rental units in both the HOME Investment Partnerships program and the Emergency Solution Grants program; maximum award amount calculations for Continuum of Care recipients and the maximum rent amount a recipient may pay for property leased with Continuum of Care funds; and flat rent calculations in Public Housing units.

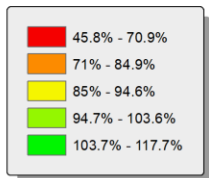
Percent of Median Gross Rent to 2018 Fair Market Rent (1BR)



Development Services Agency



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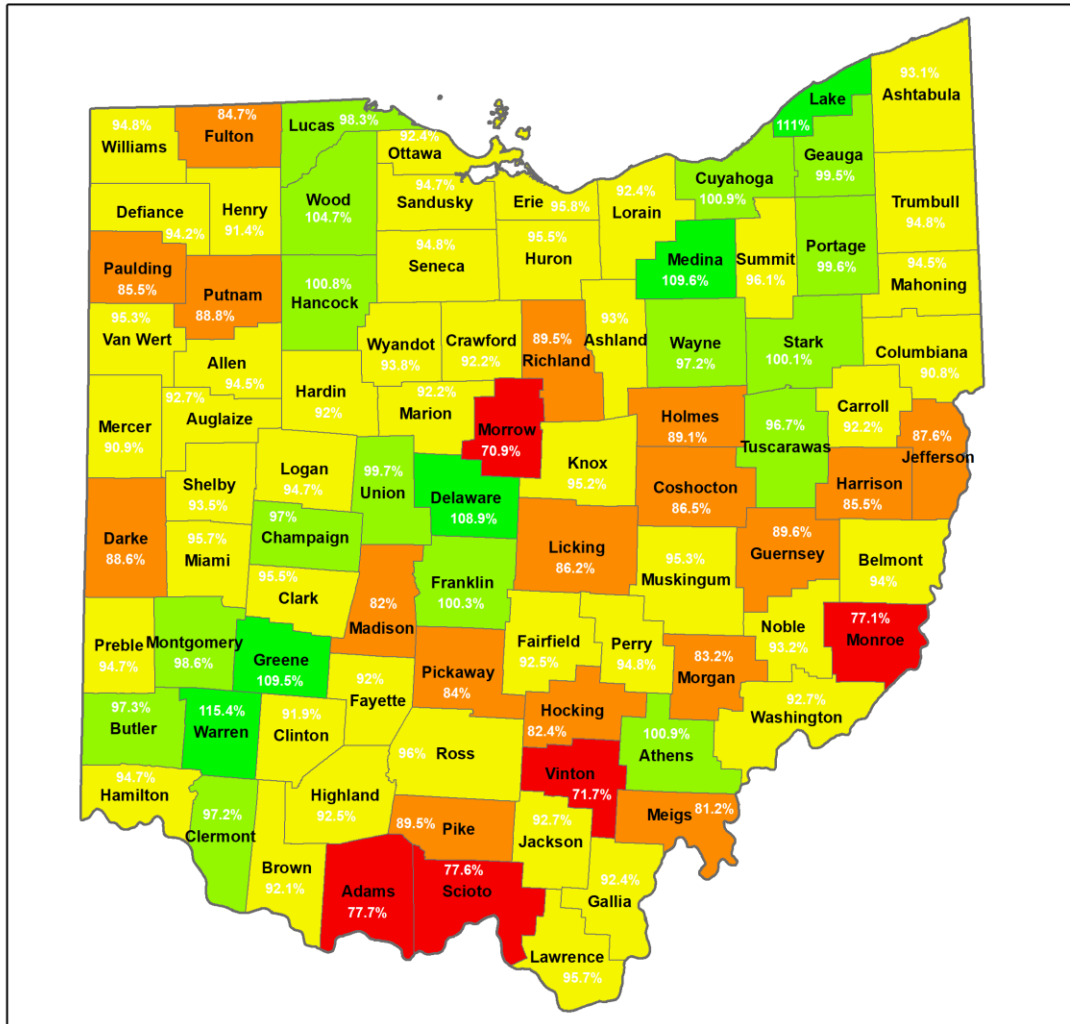
Ohio Development Services Agency
Office of Community Development
Source: 2018 HUD HOME Fair Market Rent
2013-2017 5-Year American Community Survey

Date: 12/3/2019

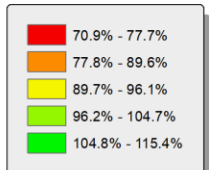
Percent of Median Gross Rent to 2018 Fair Market Rent (2BR)



Development Services Agency



0 5 10 20 30 40 Miles



Ohio Development Services Agency
Office of Community Development
Source: 2018 HUD HOME Fair Market Rent
2013-2017 5-Year American Community Survey

Date: 12/3/2019

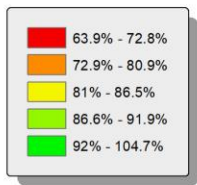
Percent of Median Gross Rent to 2018 Fair Market Rent (3BR)



Development Services Agency



0 5 10 20 30 40 Miles



Ohio Development Services Agency
Office of Community Development
Source: 2018 HUD HOME Fair Market Rent
2013-2017 5-Year American Community Survey

Date: 12/3/2019

Discussion

As indicated in the comparison of 2000 – 2015 data, housing prices rose significantly over the last 15 years. The state’s southeastern and eastern counties appear to be most impacted by higher housing costs. As housing costs continues to rise, the assumption is more households face potential cost burdens along with other housing problems.

MA-20 Condition of Housing – 91.310(a)

Introduction:

The U.S. Census Bureau provides data that directly speaks to housing stock condition through the CHAS datasets and ACS. Overcrowding, discussed earlier, is a housing need indicator, but not necessarily reflective of unit condition. Often units without plumbing or kitchen facilities are cited as indicators of condition, yet most units have these features today. The majority of units with old and unsafe electrical, heating or plumbing systems, outdated roofs and other structural problems usually have complete kitchen and plumbing facilities, though they may not meet today's health and safety standards.

As reported in the tables below, over 66% of owner-occupied housing units and 71% rental units were built before 1980. The total number of vacant properties, rehabilitation needs for both rental and owner-occupied units along with the estimated numbers of housing units occupied by low- or moderate-income families with lead-based paint hazards will be discussed in this section of the Market Analysis.

According to HUD, the median year homes were built in the nation was 1977. The median year housing units were built in Ohio is 1967 and 1969 in the Appalachian region, 10 and 8 years before the national median year, respectively. Most of Ohio's homes, roughly 66 percent, were built by 1979. Due to age, maintaining older housing can cause financial strain on the homeowner. Homes built after 1979 comprise 32.6 percent of the state's housing stock.

Year Built	Estimate	Percentage
2010 or later	124,259	2.4%
2000-2009	501,604	9.7%
1990-1999	614,813	11.9%
1980-1989	466,027	9.0%
1970-1979	741,153	14.3%
1960-1969	632,105	12.2%
1950-1959	732,973	14.1%
1940-1949	324,252	6.2%
1939 or earlier	1,051,084	20.3%

Age of Housing Stock in Ohio Table

Source: 2014-2018 ACS 5-Year Estimates

Definitions

The variable "Selected conditions" is defined for owner- and renter-occupied housing units as having at least one of the following conditions: (1) lacking complete plumbing facilities, (2) lacking complete kitchen facilities, (3) with 1.01 or more occupants per room, (4) selected monthly owner costs as a percentage of household income in 2015 greater than 30% , and (5) gross rent as a percentage of household income in 2015 greater than 30% . This information provides a general indicator of overall housing need.

Substandard condition could be defined as housing that does not meet local building, fire, health and safety codes. Substandard condition but suitable for rehabilitation could be defined as housing that does not meet local building, fire, health and safety codes but is both financially and structurally feasible for rehabilitation.

Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	630,336	21%	666,189	43%
With two selected Conditions	12,370	0%	34,625	2%
With three selected Conditions	2,177	0%	2,532	0%
With four selected Conditions	262	0%	89	0%
No selected Conditions	2,395,299	79%	841,205	54%
Total	3,040,444	100%	1,544,640	100%

Condition of Units Table

Data Source: 2011-2015 ACS

Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	381,912	12%	138,119	9%
1980-1999	665,715	22%	322,091	21%
1950-1979	1,245,884	41%	658,481	42%
Before 1950	746,933	25%	425,949	28%
Total	3,040,444	100%	1,544,640	100%

Year Unit Built Table

Data Source: 2011-2015 CHAS

Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	1,992,817	66%	1,084,430	70%
Housing Units build before 1980 with children present	238,420	8%	159,750	10%

Risk of Lead-Based Paint Table

Data Source: 2011-2015 ACS (Total Units) 2011-2015 CHAS (Units with Children present)

Need for Owner and Rental Rehabilitation

In the PY 2020 – 2024 Consolidated Plan Needs Survey stakeholders and the public were specifically asked to rank owner and rental rehabilitation issues. The results of the survey indicate a strong need exists with 32.9% of all respondents indicating that rental property maintenance is one of the top five needs in their respective communities, and 19.1% of respondents indicating that private home property maintenance is also among the top five needs in their respective communities.

The following table includes data from the 2015 US Census American Housing Survey for housing quality, which can be assumed will translate to the total number of units statewide in need of repair or rehabilitation. (Note: HUD defined housing inadequacy, severity classifications, and deficiency types.) Plumbing deficiencies include lacking hot or cold water, lacking a full bathroom and sharing a bathroom with non-household members. Heating deficiencies include uncomfortable cold during winter lasting 24 hours or more because of heating equipment breakdowns. Electric deficiency is defined as lacking electricity. Wiring deficiencies include exposed wiring, rooms with no working wall outlets, and blown fuses or tripped circuit breakers. Upkeep deficiencies include water leaks, holes in floors, holes or open cracks in walls or ceilings, peeling paint or broken plaster on walls or ceilings, and signs of rats. Other deficiencies include toilet breakdowns, reliance on unvented room heaters and lacking complete kitchen facilities.

Over 100,000 renter-occupied units (6.9%) are rated as inadequate by HUD, mostly due to upkeep issues caused by leaks, holes, open cracks, peeling paint, broken plaster and rats. Of these units, more than 20,000 (1.4% of all renter households) are rated as severely inadequate, primarily due to uncomfortable cold in winter caused by heating equipment breakdowns.

Occupancy Characteristics Table

Characteristics	Owner	Percent of Owner Units	Renter	Percent of Renter Units	Total	Percent of Total Units
Severely Inadequate	17,100	0.6%	21,500	1.4%	38,600	0.8%
Moderately Inadequate	75,500	2.5%	87,500	5.5%	163,000	3.6%
Upkeep	55,000		59,000		114,000	
Other	21,700		29,300		51,000	

Source: 2015 U.S Census American Housing Survey

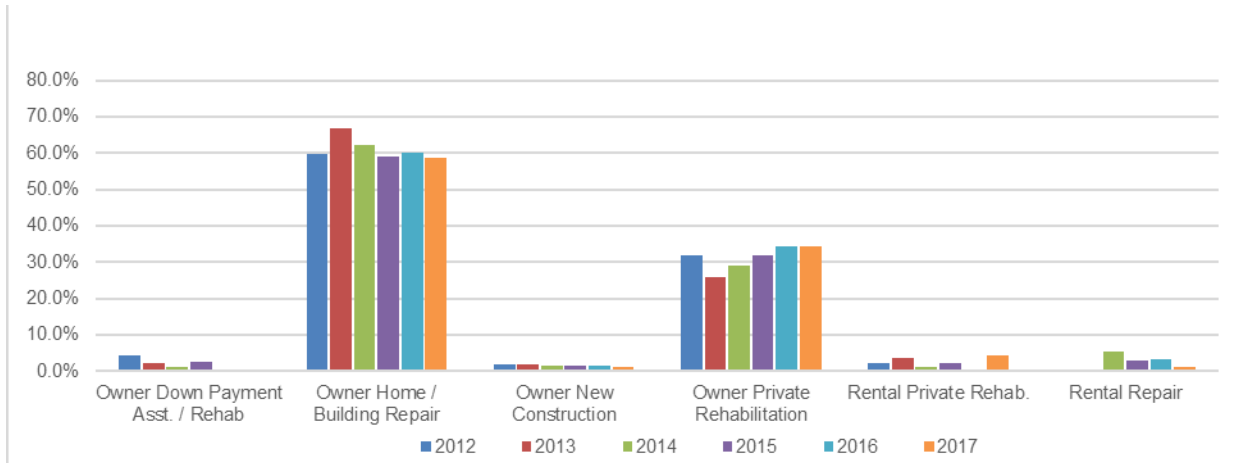
	Homeowner Units	Rental Units	All Housing Units
Year-round housing inventory	3,113,873	1,693,461	4,807,334
Occupied	3,035,485	1,565,964	4,601,449
Sold or rented, not occupied	21,657	25,338	46,995
Available for sale or rent	56,731	102,159	158,890
Available housing vacancy rate	1.8%	6.0%	3.3%

Occupancy Rate Table

Source: 2012-2016 ACS 5-Year Estimates

Note: The "year-round housing inventory" includes all occupied units, units sold or rented but not occupied and units available for sale or rent. It excludes units for seasonal or occasional use, units for migrant workers and any other vacant units that are not currently on the housing market for whatever reason. The "available housing vacancy rate," is defined as the number units available for sale or rent divided by the number of units in the year-round housing inventory.

The table below shows owner and rental projects funded through the Community Housing Impact and Preservation Program increased since PY 2012. As illustrated in the table, communities consistently need funding for rental and owner rehabilitation projects statewide. Over time, total percentage of units completed increase over time for these activity types while repair has decreased slightly.



CHIP Percent of Units by Tenure Type and Year Graph

Source: PY2012 – PY2017 State of Ohio CAPER

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

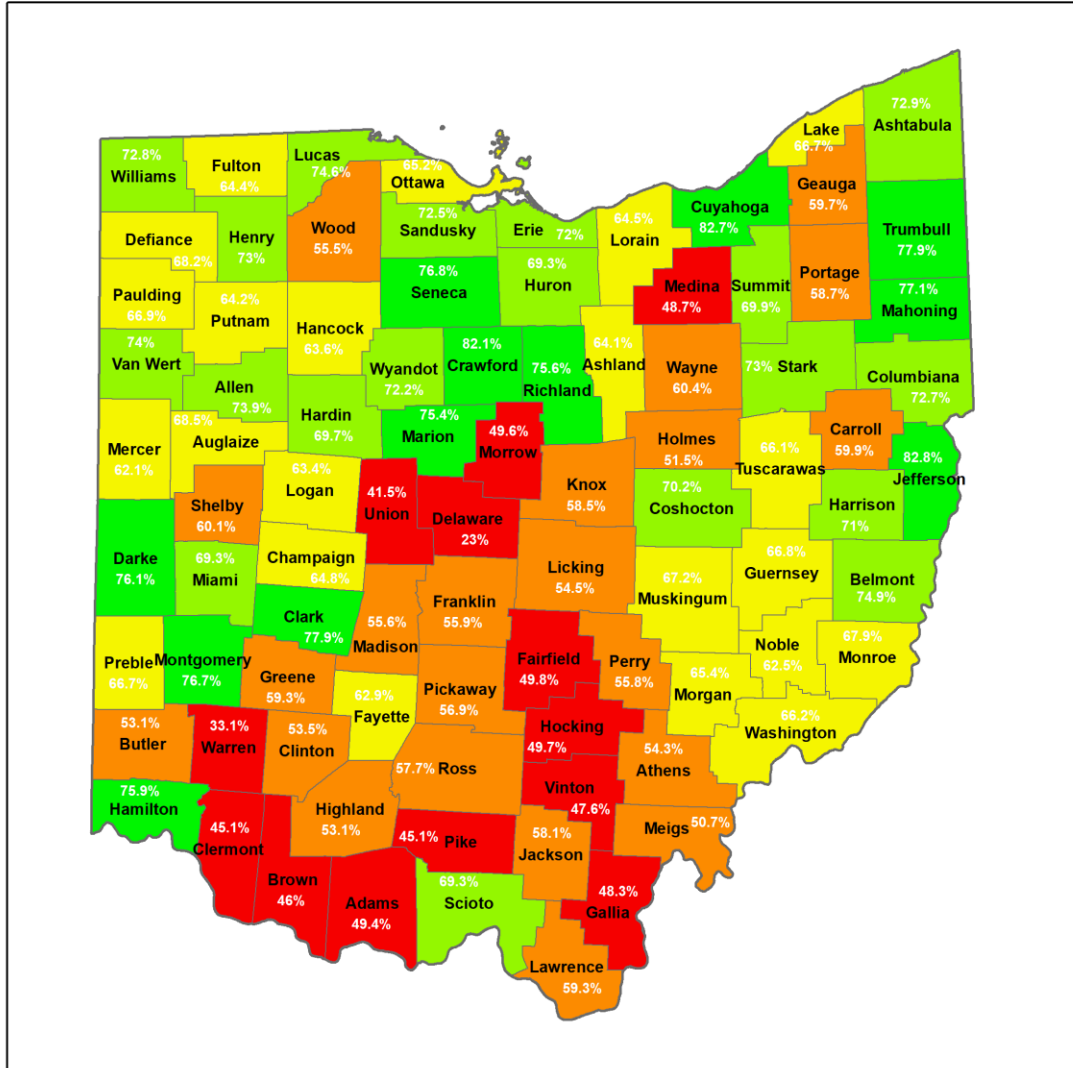
As reported in the 2013-2017 ACS 5-Year Estimates there were 1,095,736 occupied rental units built before 1980, representing 69.6% of occupied rental units. With the 2011 – 2015 LMI data reporting that the state has 41.4% LMI persons it is assumed 454,668 rental units occupied by low- and moderate-income families could potentially be exposed to lead-based paint hazards. A total of 1,981,312 occupied owner units were reported in the 2013-2017 ACS 5-Year Estimates as being built before 1980, representing 64.7% of occupied owner housing units. When factoring the state’s LMI percentage into the total number owner units built before 1980 it is estimated that approximately 822,131 low- and moderate-income owner households could potentially be exposed to lead-based hazards. The following map includes the percentage of all occupied housing units that were built before 1980 to

provide some insight on which counties are most impacted by lead based-hazards present in housing units.

Percent of Occupied Housing Units Built Before 1980



Development Services Agency



Ohio Development Services Agency
Office of Community Development
Source: 2013-2017 ACS 5-Year
Estimates

Date: 12/5/2019

MA-25 Public and Assisted Housing – (Optional)

Introduction:

As indicated in the Needs Assessment, Ohio and its agencies are not designated as a public housing authority nor do they administer public housing units. These functions are performed by local public housing authorities within the state. Public housing authorities must continue to provide the state with annual and five-year plans as part of the Certification of Consistency with the State of Ohio’s Consolidated Plan. The list of Public Housing Authorities in the state can be found on the HUD website at <https://www.hud.gov/states/ohio/renting/hawebsites>.

Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project-based	Tenant-based	Special Purpose Voucher		
							Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers available	0	295	11,592	30,221	110	5,116	602	4,638	18,482

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

Total Number of Units by Program Type Table

Data PIC (PIH Information Center)

Source:

Describe the supply of public housing developments:

Ohio and its agencies do not administer public housing units this section is not applicable.

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

This section is not applicable. The state and its agencies do not administer public housing units.

Describe the Restoration and Revitalization Needs of public housing units in the jurisdiction:

This section is not applicable. The state and its agencies do not administer public housing units.

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

This section is not applicable. The state and its agencies do not administer public housing units.

MA-30 Homeless Facilities – 91.310(b)

Introduction

Ohio reported the following data to HUD separately as part of the HUD 2018 Continuum of Care Homeless Assistance Programs Housing Inventory Count Report. The data below is based on information provided to HUD by Continuums of Care in the 2018 Continuum of Care application and has not been independently verified by HUD. CoCs were instructed to collect data for a point-in-time during the last week of January 2018.

HUD’s point-in-time count does not include persons or beds in Permanent Supportive Housing as currently homeless. The following information provides additional information regarding the specific types of housing and associated subgroups reported in the table below:

- Permanent supportive housing includes rapid re-housing and other permanent housing.
- Other Permanent Housing (OPH) consists of PH - Housing with Services (no disability required for entry) and PH - Housing Only, as identified in the 2017 HMIS Data Standards.
- Family Units and Family Beds categories include units and beds for households with one adult and at least one child under age 18.
- Chronic Beds include beds in Permanent Supportive Housing dedicated to serve chronically homeless persons.
- Veteran Beds and Youth Beds, respectively, include beds dedicated to serve homeless veterans and their families, and include beds dedicated to housing homeless youth age 24 and younger.

Facilities Targeted to Homeless Persons

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	2,890	-	850	10,926	-
Households with Only Adults	4,292	-	1,032	12,367	-
Chronically Homeless Households	-	-	-	8,062	-
Veterans	191	-	452	3,568	-
Unaccompanied Youth	175	-	181	609	-
Not identified	-	1,171	-	-	-

Facilities Targeted to Homeless Persons Table

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

Funded supportive housing agencies are expected to refer clients to available community resources. Most start with Ohio Department of Jobs and Family Services where clients can apply for Medicaid and SNAP benefits and to begin seeking employment or sign up for Social Security Income if unable to work. Some organizations become Medicaid-certified and can bill for case management services. These organizations provide general counseling in addition to housing-related case management. Some partner with counseling, medical and dental professionals to provide services onsite. The size of the housing organization is an indicator of the level of services provided onsite and those referred to community resources.

OhioMHAS) is committed to ensuring that an array of safe, decent and affordable housing options are available for Ohioans experiencing mental illness. The Projects for Assistance in Transition from Homelessness (PATH) program offers services for people with serious mental illness (SMI), including those with co-occurring substance use disorders, who are experiencing homelessness or are at risk of becoming homeless. PATH services are for people with serious mental illness, including those with co-occurring substance use disorders, who are experiencing homelessness or at risk of becoming homeless. PATH services include community-based outreach, mental health, substance abuse, case management and other support services, as well as a limited set of housing services.

OhioMHAS also funds recovery housing, transitional-time limited housing, permanent supportive housing, residential care facilities and services and supports within those facilities. All housing and supports within are funded through the state's 50 Alcohol Drug and Mental Health (ADAMH) Boards and their contracted providers.

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

The services provided by various agencies are included in the SP-40 Institutional Delivery Structure section of this plan.

MA-35 Special Needs Facilities and Services – 91.310(c)

Introduction

In Ohio, housing and services are provided by several agencies including the Department of Mental Health and Addiction Services (OhioMHAS), the Department of Developmental Disabilities (ODODD), the Ohio Department of Aging (ODA) and Opportunities for Ohioans with Disabilities (OOD). Development coordinates with these agencies and other service providers to determine facility and servicing needs.

HOPWA Assistance Baseline Table

Type of HOWA Assistance	Number of Units Designated or Available for People with HIV/AIDS and their families
TBRA	45
PH in facilities	0
STRMU	290
ST or TH facilities	0
PH placement	63

HOPWA Assistance Baseline Table

Data Source: HOPWA CAPER and HOPWA Beneficiary Verification Worksheet

To the extent information is available, describe the facilities and services that assist persons who are not homeless but who require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing

OHioMAS and ODODD have a variety of programs to assist special needs non-homeless populations in the state. OhioMHAS is committed to ensuring that an array of safe, decent and affordable housing options are available for Ohioans experiencing mental illness. It's important to note OhioMHAS' services have been greatly expanded to serve persons experiencing homelessness in recent years. ODODD is also committed to providing a continuum of housing options for individuals they serve, whether these individuals are leaving institutional settings or currently living in the community. These housing options are designed to ensure safety and affordability in light of the populations served. Supportive services are provided via Medicaid coverage.

ODA offers an array of services and resources to help older adults and their families continue to grow, thrive and contribute. These services and resources are coordinated on the community level by local organizations including area agencies on aging, long-term care ombudsman programs, senior centers, employment providers, and others. ODA assists in Medicaid Program offers an array of services to help older adults and others get the care they need in the settings they prefer, including their homes. Programs include PASSPORT, Assisted Living Waiver, PACE and MyCare Ohio.

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

OhioMAS distributed recovery housing funding to operators across Ohio to develop and expand recovery housing capacity. These funds are a result of working with members of the legislature to prioritize funding for recovery housing in response to a need clearly identified in communities. In SFY 2018, 25 capital recovery housing projects with 242 beds were funded for people with addiction who have received treatment and want to continue to focus on their recovery in a sober, accountable environment. Recovery Housing Initiative (GRF) funds assisted at least 140 operators to sustain and expand recovery housing through new and existing partnerships with local ADAMH Boards in PY19. In SFY 2019, 24 Capital projects with 227 recovery housing beds received funding.

In addition to the Recovery Housing, OhioMAS also fund Permanent Supportive Housing (PSH) for the development of projects in the community. This type of supportive housing is meant to enable this population to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or coordinated with other public or private service agencies.

PSH opportunities provide access both to affordable housing and to a flexible and comprehensive array of supportive services designed to help tenants achieve and sustain housing stability and move toward recovery. Housing is covered by Ohio tenant landlord law.

ODODD operates the Rental Assistance Program (RAP), a tenant-based subsidy that makes rent affordable. RAP is available to individuals exiting institutions who wish to live in community. ODODD also operates the Community Capital Assistance program which provides capital assistance to county boards to build, purchase or renovate housing for individuals who qualify for DODD's supported living services.

In addition, the Ohio Housing Finance Agency (OHFA), Ohio Department of Medicaid (ODM), Ohio Department of Developmental Disabilities (DoDD) and Ohio Department of Mental Health and Addiction Services (OhioMHAS) partnered to implement the Ohio 811 Project Rental Assistance Program. This program allows extremely low-income households composed of one or more adults with a disability to live in an integrated setting through rental subsidy and access to supportive services. Extremely low-income households with at least one adult age 18-61 with a disability are eligible to participate in the Ohio 811 Program. The state has 485 units distributed within Low-Income Housing Tax Credit properties throughout the state invested in this program.

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

The state's approach to addressing housing needs has been decentralized, allowing communities to address their needs at the local level through planning and program implementation. For many special populations, whose needs vary from person to person, this approach allows communities the flexibility to develop solutions appropriate to their situation. As part of this process, the OCD requires communities to engage in locally driven public participation and planning efforts to determine the needs in their local communities. The following programs administered by the OCD can include activities that address housing and supportive service needs with respect to persons who are not homeless but have other special needs.

The OCD will also provide funding for non-homeless special needs populations through the Housing Opportunities for Persons with AIDS (HOPWA), CHIP, Community Development and Housing Assistance Grant Programs. The HOPWA Program will provide nonprofit agencies with the resources to devise and implement long-term comprehensive strategies for meeting the housing needs of individuals and families with acquired immunodeficiency syndrome (AIDS) or related diseases. The HOPWA Program provides the following housing and supportive services: short-term emergency rental and utility assistance, operating costs for community residences, assistance with finding affordable permanent housing, case management, respite care, day care, transportation, etc. The Housing Assistance Grant Program will continue to fund programs that provide emergency home repairs. The program assists a variety of low-income persons, giving priority to homeowners. Some funded programs target persons with a disability or persons older than 60, oftentimes accessibility modifications.

The Community Development Program can provide public services to local communities that have identified the public service needs as part of their local CDIS submitted to the OCD. The CHIP program can provide a number of housing services that local communities established in the grant application.

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

N/A

MA-40 Barriers to Affordable Housing – 91.310(d)

Negative Effects of Public Policies on Affordable Housing and Residential Investment

As HUD itself noted in the March 13, 2006 regulations revising the Consolidated Plan requirements, states have less control over barrier removal than entitlement jurisdictions and cited comments by a group representing state community development agencies that it was difficult for states to meet goals for affordable housing barrier removal because states have very minimal control over the major barriers identified by HUD (zoning, local fees, etc.). Zoning and land use decision-making are an inherently local processes, subject to a range of influences including market forces and citizen input.

This is certainly true in Ohio, which has a long tradition of local “home-rule” self-governance. In recognizing this reality, the OCD instead requires each of its local direct CDBG Allocation grantees (which cover the entire non-entitlement area of the state) to conduct a local Analysis of Impediments and devise a strategy and schedule to address them. These analyses are required to include an assessment of local regulations and policies that may create barriers to producing or accessing affordable housing. The OCD requires communities to submit their Analysis of Impediments for review. Below is a summary of the 2019 grantee-identified impediments to fair housing choice:

Impediment	Percent of grantees
Lack of affordable housing	74%
Need for Fair Housing education	72%
Lack of accessible housing	56%
Lack of affordable/accessible housing for individuals with disabilities	51%
Lack of public transportation	38%
Lending issues (e.g. predatory lending, discrimination, lack of financial literacy)	28%
Lack of affordable/accessible housing for seniors	26%
Exclusionary Zoning	25%
Poor condition of housing stock	21%
Fair Housing Enforcement	19%
Lack of building codes/code enforcement	13%
Lack of transitional housing	13%
Lack of understanding/failure to make reasonable accommodations/modifications	12%
Lack of housing for larger families	8%
Language barriers (Spanish)	7%
Lack of employment opportunities	7%
NIMBY	6%
Segregation	5%
Discriminatory advertising practices	4%
Lack of public infrastructure	4%

State of Ohio Analysis of Impediments Table

Source: 2019 State of Ohio Analysis of Impediments

MA-45 Non-Housing Community Development Assets -91.315(f)

Introduction

This analysis of the Ohio economic development and labor market provides insight to the economic conditions of the areas that have the potential to benefit from the state's programs. Ohio currently has the 7th largest economy in the United States, making it essential to identify ways to further economic development in the state. In recent years, the state's unemployment rate is at an unprecedented low, despite a slow job growth rate and low labor market participation. To maintain the low unemployment rate in future years, it is vital that Ohio focuses on developing work force labor skills and investing in growing sectors.

Ohio's manufacturing sector employs 686,465 people. The state's factories lead the nation in plastics and rubber, fabricated metals, and electrical equipment and appliance production. Ohio also is a leading producer of steel, autos, and trucks. Skilled manufacturing workforce, healthcare hubs, relatively low business costs, and increasing diversification in the metropolitan areas are areas of economic strength.

The state's private sector is comprised of 763,418 self-employed firms and 181,379 employer firms. Small businesses employing one or more workers account for 20 percent of all firms and employ 48 percent of the workforce. Self-employed or non-employer firms comprise 78 percent of all businesses.

There are more than 81,000 African American-owned businesses in Ohio. Of that number, there are more than 3,300 businesses with a payroll and, combined, employ nearly 44,000 workers with an annual payroll of more than \$1.2 billion. Hispanic Americans own more than 16,000 businesses in Ohio, of which there are 1,553 Hispanic businesses with a payroll and, combined, employ more than 23,600 workers with an annual payroll of more than \$528 million. Asian Americans own more than 21,000 businesses in Ohio. Of that number, businesses with a payroll total more than 7,000 and, combined, employ more than 64,000 workers with an annual payroll of nearly \$1.8 billion.

Ohio's civilian labor force totaled more than 5.7 million in 2018, with more than 5.4 million individuals employed. The national unemployment rate for December 2019 was 3.5 percent. Ohio's unemployment rate was 4.2 percent in December 2019 compared to 5 percent a year earlier. Total employment in Ohio is expected to increase 4.4 percent from 2016 to 2026, a projected gain of 253,300 jobs.

The number of African American Ohioans in the civilian labor force is more than 694,000; the unemployment rate for African American Ohioans is 9.5 percent. African Americans in the labor force between the ages of 16 and 24 have an unemployment rate of 13.2 percent. For Ohio, as a whole, the same age group has a 7.9 percent unemployment rate. Employed African Americans are heavily represented in service and sales/office occupations. Of the more than 628,000 employed African Americans in Ohio, 26 percent are in service occupations with 52,000 in healthcare support. By comparison, 17 percent of all Ohioans are in service occupations. Production/transportation/material moving occupations account for 23 percent with 62,000 African American Ohioans involved in production occupations alone.

The number of Hispanic Ohioans in the civilian labor force is nearly 212,000. Hispanic Ohioans have an unemployment rate of 7.3 percent. Hispanics make up 5.6 percent of the labor force between the ages of 20 and 24. This coincides with the age distribution of Ohio Hispanics and the concentration of young adults.

Employed Hispanics are heavily represented proportionally in the service occupations, especially in food preparation and serving occupations, compared to the state. Of the 196,000 employed, nearly 19,000, or 9.5 percent, are in food occupations. For all Ohio workers, only 5.9 percent are in food occupations. Production occupations and cleaning and construction occupations also have higher concentrations of Hispanic workers compared to the whole workforce.

Based on 2018 American Community Survey data, the number of Asian American Ohioans in the civilian labor force is greater than 147,000 and accounts for 2.5 percent of the civilian labor force. Asian Americans in Ohio have an

unemployment rate of 4.8 percent; Ohioans as a whole have an unemployment rate of 2.5 percent. Employed Asian Americans are highly represented in professional occupations, compared to Ohioans as a whole. Of the roughly 143,000 employed Asian Americans, nearly 46 percent are in occupations of computer/engineering/science (20 percent), management (16 percent), and healthcare (10 percent). There is also a significant number in education occupations.

Economic Development Market Analysis

Business Activity

Business by Sector	Estimate of Workers
Agriculture, Mining, Oil & Gas Extraction	55,716
Arts, Entertainment, Accommodations	512,223
Construction	311,464
Education and Health Care Services	1,361,986
Finance, Insurance, and Real Estate	358,994
Information	88,446
Manufacturing	847,686
Other Services	249,895
Professional, Scientific, Management Services	551,829
Public Administration	211,858
Retail Trade	591,654
Transportation and Warehousing	300,083
Wholesale Trade	133,732
Total	5,637,441

Business Activity Table

Data 2018 ACS 1-Year Estimates, Industry by Class of Worker for the Civilian Employed Population 16 Years and Over
Source:

Labor Force

Civilian Labor Force	
Total Population in the Civilian Labor Force	5,888,990
Employed	3,503,949
Unemployment Rate	5.80%

Labor Force Table

Data Source: 2014-2018 ACS 5-Year Estimates, Comparative Economic Characteristics

Occupation by Sector	Estimate
Management, business, science, and art	2,025,595
Farming, fisheries, forestry occupations	-
Service	954,527
Sales and office	1,209,807
Construction, extraction, maintenance, repair	416,218
Production, transportation, and material moving	943,428

Occupations by Sector Table

Data Source: 2014-2018 ACS 5-Year Estimates, Comparative Economic Characteristics

Travel Time

Travel Time (Minutes)	
Mean	23.6

Travel Timetable

Data Source: 2014-2018 ACS 5-Year Estimates, Comparative Economic Characteristics

Education:

Educational Attainment by Employment Status			
Educational Attainment	In Civilian Labor Force		Not in Labor Force
	Employed	Unemployed	
Less than high school	230,175	35,022	240,526
High school graduate or equivalent	1,277,542	82,485	514,176
Some college or associate's	1,422,956	69,372	369,529
Bachelor's degree or higher	1,533,241	33,385	229,189

Educational Attainment by Employment Status Table

Data Source: 2014-2018 ACS 5-Year Estimates, Comparative Economic Characteristics

Educational Attainment by Age

Educational Attainment by Age (18-24)	
Education Level	Estimate
Less than high school	144,436
High School Graduate or Equivalent	362,436
Some college or associates	469,420
Bachelor's degree or higher	110,334

Educational Attainment by Age Table (Ages 18-24)

Data Source: 2014-2018 ACS 5-Year Estimates, Educational Attainment

Educational Attainment by Age (18 and above)					
Education Level	Age				
	18-24	25-34	35-44	45-64	65+
High School Graduate or Equivalent	831,856	1,393,553	1,278,571	2,874,780	1,612,459
Bachelor's degree or higher	110,334	498,688	460,998	839,762	406,122

Educational Attainment by Age Table (Age 18+)

Data Source: 2014-2018 ACS 5-Year Estimates, Educational Attainment

Educational Attainment by Age (25+)	
Education Level	Estimate
Less than 9th grade	223,320
9th to 12th grade, no diploma	562,840
High school graduate or equivalent	2,639,478
Some college, no degree	1,624,247
Associate degree	681,630
Bachelor's Degree	1,370,810
Graduate or professional	834,760

Educational Attainment by Age Table (Age 25+)

Data Source: 2014-2018 ACS 5-Year Estimates, Educational Attainment

Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment - Median Earnings in the Past 12 Months	
Educational Attainment	Median Earnings in Past 12 Months
Less than high school	21,907
High school graduate or equivalent	30,708
Some college or associate degree	35,125
Bachelor's degree	52,656

Median Earnings in the Past 12 Months Table

Data Source: 2014-2018 ACS 5-Year Estimates, Educational Attainment

Overall Economic State of Ohio

The seasonally adjusted unemployment rate in Ohio in November 2019 was 4.2%. Ohio, compared to other states, was ranked 41st in unemployment rate. (U.S. Bureau of Labor Statistics, Unemployment Rates for States, Seasonally Adjusted). Despite record low unemployment rates – the November 2019 rate being the lowest since 2001 – Ohio still ranks low in comparative unemployment rate with the rest of the country, which is also at a record low.

Ohio is also experiencing a low labor market participation level, as some working-age individuals never returned to the workforce following the recession. To return to the pre-recession labor force level, Ohio needs an estimated 152,000 people of working-age population age to return or seek to return to the civilian labor force. (Policy Matters Ohio)

It is imperative that Ohio targets the need for increased labor market participation, and the growing urgency to prepare a highly skilled and educated workforce to meet employer needs in key industries.

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

The major employment sectors in Ohio are manufacturing, education and health care services. Ohio's manufacturing sector is a strong part of the state economy, and the largest job industry. The health services field is a fast-growing employment sector in Ohio and is predicted to grow in coming years. The table below lists the state's major employers.

Company	Employment Estimate	Sector
Cleveland Clinic Foundation	50,825	Health
Wal-Mart Stores, Inc.	49,330	Retail: General Merchandise
Kroger Co.	45,340	Retail: Food Stores
Ohio State University and Medical Center	34,470	Education and Health
Bon Secours Mercy Health, Inc.	31,500	Health
University Hospitals Health System, Inc.	28,000	Health
Wright-Patterson Air Force Base	28,000	Government: Air Force base
OhioHealth	26,600	Health
ProMedica Health System	22,500	Health
JPMorgan Chase & Co.	21,000	Finance: Bank
Giant Eagle, Inc.	19,000	Retail: Food Stores
Cincinnati Children's Hospital Medical Center	15,660	Health
Honda Motor Co., Ltd.	15,000	Manufacture: Motor Vehicles

Major Employers in Ohio Table Source: ODSA Office of Research

Describe the workforce and infrastructure needs of business in the state.

Ohio is experiencing an unprecedented low unemployment rate; however, this is accompanied by a low labor market participation level. Ohio added jobs at a slower rate than the national average since the end of the recession in 2009; this trend continues today. In Ohio, labor market participation decreased since the end of the recession in 2009 as workers left the workforce and never returned or sought to return. In Ohio it remains imperative to increase labor force availability and preparedness to ensure the labor market participation level grows. Future economic development success will primarily rest on addressing labor force availability and preparedness through workforce development. Ohio’s ability to supply a skilled labor force will increasingly determine the state’s capacity for economic development. Ohio’s current demographic and economic trends show a reduction in the availability of potential workers. This is occurring simultaneously as workforce skill demands are increasing due to advances in applied technology across industries, a shift toward a knowledge-based economy, and expanding global markets and competition.

An economic development initiative in Ohio is JobsOhio. This private, non-profit corporation is designed to help Ohio’s job-creation efforts by singularly focusing on attracting and retaining jobs, with an emphasis on strategic industry sectors. JobsOhio has highlighted several key sectors that are expected to expand and drive economic development in Ohio; these growing sectors will require a growing skilled workforce. These industries include:

- Aerospace & Aviation
- Automotive
- BioHealth
- Energy; Shale Energy and the growing Renewable Energy Market
- Financial Services
- Logistics
- Manufacturing
- Technology

Describe any major changes that may have an economic impact, such as planned public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period. Describe any needs for workforce development, business support or infrastructure these changes may create.

Total employment in Ohio is expected to grow in future years, with several leading industries expecting an industry growth rate higher than the average growth rate across all state industries. Developing a skilled manufacturing workforce, an increasing number of healthcare hubs around the state, and relatively low business costs are areas of economic strength for Ohio.

Ohio’s manufacturing industry is strong and developing a skilled manufacturing workforce will contribute to job growth rate, lower unemployment rates, and higher labor market participation. As reported by the Ohio Department of Jobs and Family Services in 2018, the largest and fastest growing sector in Ohio is healthcare services, which is projected to grow from 820,391 jobs to 956,022 between the years of 2016 – 2026, representing a 16.5% increase. This growing industry will require higher education levels. The growing shale, renewable energies, and technology sectors will require a skilled workforce. These sectors, with increasing investments statewide, will require expanding state education and skill-training infrastructure to create a skilled workforce.

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

Ohio currently requires expanding infrastructure and programs dedicated to training a skilled workforce to raise the labor market participation rate while experiencing an economic expansion. This includes skilled labor and a workforce with a higher education level, including associate-level degrees and beyond. Adding skilled, working-age adults with these qualifications are necessary to supply the growing industries in Ohio.

Based on current trends, the key to preserving Ohio's state of economic expansion is workforce development to meet the needs of a contemporary economy. It is estimated that currently 64% of Ohio's jobs require postsecondary education and training. Therefore, matching education accessibility with employer demand to determine where 'talent gaps' exist is key to Ohio's workforce development efforts. It is imperative that a link between education and workforce skill demands. According to the 2019 Ohio Postsecondary Education Attainment Report, Ohio's metropolitan, entitlement communities have higher levels of postsecondary education attainment than non-entitlement areas; it is essential that Ohio focuses initiatives on addressing existing inequities and developing education accessibility for non-entitlement communities.

Describe current workforce training initiatives supported by the state. Describe how these efforts will support the state's Consolidated Plan.

Employer services are currently offered primarily through Ohio's OhioMeansJobs centers. These centers offer at least four different types of employer services:

1. Employee recruitment including
 - Posting and filling of job openings,
 - Job fairs,
 - Mass recruitments, and
 - Help writing position descriptions.
2. Employee selection including such services as
 - Screening of qualified applicants,
 - Skill assessment,
 - Job readiness,
 - Aptitude testing, and
 - Support for hiring special populations (e.g., older workers, veterans, workers with disabilities, youth).
3. Employee training including
 - Referrals to local employee training providers,
 - Computer training labs,
 - Use of conference rooms, and
 - Assistance with establishing apprenticeship programs.
4. Human resource planning including
 - Customized workshops,
 - Resources for small businesses/entrepreneurs,
 - Employee retention, and
 - Supportive services for employees.

According to JobsOhio, Ohio is ranked 9th in competitive labor environment across the country, and 7th in leading workforce development programs. JobsOhio highlights 54 technical centers in Ohio that offer credentials, certificates, and degrees as key workforce development programs.

Ohio's Department of Higher Education dedicated initiatives towards improving accessing postsecondary education and skill attainment. The strategy is to invest in college access, affordability, and workforce alignment. Additional initiatives are targeted at improving obtaining a high-school diploma or equivalent, college credit programs to give high-school students a head start, and programs such as Finish for your Future which targets postsecondary education for adult/non-traditional college students.

These programs include College Credit Plus, High-School Industry Recognized Credential Programs, Finish for your Future, Competency-Based Education, and more. The Innovative Workforce Incentive Program works to increase the number of high school students who earn industry-recognized credentials in priority industry sectors. It offers schools additional dollars when students earn eligible credentials and implementation dollars to aid in establishing these programs. The Regionally Aligned Priorities in Delivering Skills (RAPIDS) program offers grants to purchase equipment for higher education institutions to strengthen educating and training students and maximize workforce development across defined regions of the state; this program also targets educational development in non-entitlement areas of the state. These programs are a few initiatives to connect educational attainment to the economy's needs.

Describe any other state efforts to support economic growth.

Ohio's Governor's Office of Workforce Transformation has several initiatives focused on connecting Ohio's business sectors, training, and education communities to build a dynamically skilled, productive, and purposeful workforce for Ohio. The office developed a workforce supply tool which provides businesses with data on graduates from high-demand fields across Ohio's regions to help recruit talent. The office also developed a regional workforce collaboration that connects students, job seekers, and businesses to streamline workforce acquisition. The Office of Workforce Transformation has several initiatives that aim to target workforce acquisition for in-demand jobs and industries. These include the Innovative Workforce Incentive Program, which aims to prepare student for key industries, the Industry Sector Partnership, which aims to further collaboration between local businesses, educational institutions, and training providers. Additionally, they have multiple initiatives to highlight in-demand jobs and positions.

Staff at the Office of Workforce Transformation work closely with the JobsOhio team and have most recently collaborated on a regional team strategy and planning process. The Governor's Office of Workforce Transformation employs an Executive Workforce Board to advise the Governor and Lieutenant Governor about emerging workforce needs, solutions, and best practices. The board engages communities, state development agencies, and stakeholders to identify ways to prepare Ohioans with the skills needed for in-demand jobs.

An additional initiative of Governor Mike DeWine and Lieutenant Governor Jon Husted is Ohio's Common Sense Initiative (CSI) which aims to amend or rescind regulations deemed as obstacles to the state's job growth, economic development, or business investment. Since the program's launch, CSI has reviewed nearly 15,000 state agency regulations, 60% of which were identified to be obstacles to Ohio businesses, and have since been amended or rescinded.

MA-50 Needs and Market Analysis Discussion

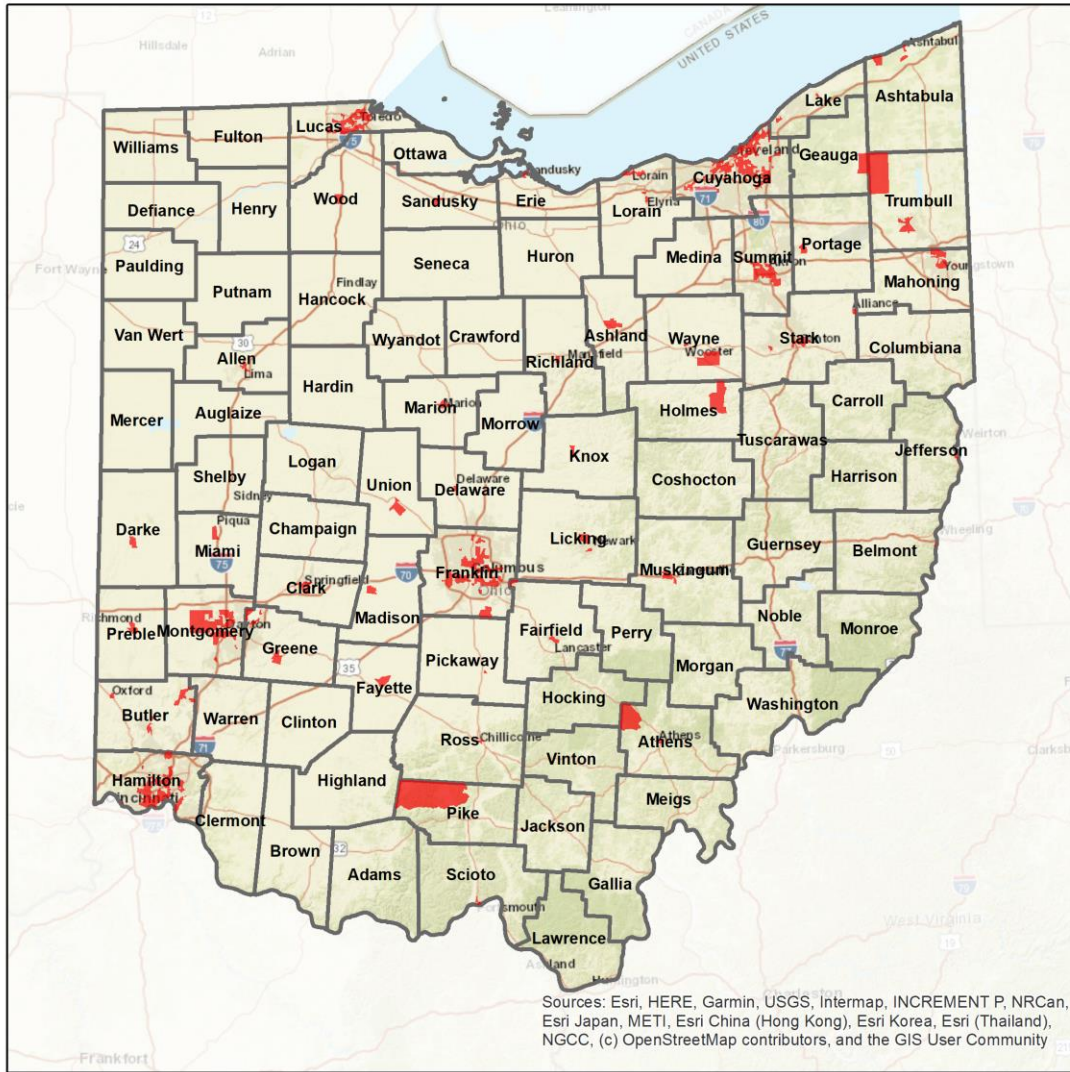
Are there areas where households with multiple housing problems are concentrated? (include a definition of "concentration")

A concentration of housing problems can be defined by using the existing definition of disproportionately greater need compared to the jurisdiction as a whole found at CFR 24 91.305 (b)(2). The regulation CFR 24 91.305 (b)(2) states that "For any of the income categories enumerated in paragraph (b)(1) of this section, to the extent that any racial or ethnic group has disproportionately greater need in comparison to the needs of that category as a whole, assessment of that specific need shall be included. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least 10 percentage points higher than the percentage of persons in the category as a whole." The following map helps to identify areas that have concentrations of housing problems by census tracts. A total of 29.4% of all housing units in the state reported having multiple housing problems in the 2015 CHAS dataset. Based on that data and the definition of concentration as 10% above the state average, a concentration exists when geographic areas have more than 39.4% of occupied housing with one or more housing problems. The following map indicates that concentrations of housing exist in both rural and urban areas.

Census Tracts with Concentration of Housing Problems



Development Services Agency



0 5 10 20 30 40 Miles

Census Tracts with Housing Problems

39.5% - 80.3%

Ohio Development Services Agency
Office of Community Development
Source: 2015 CHAS Dataset

Date: 12/10/2019

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

The following definitions have been used by HUD to determine concentrations of low income and areas of minority concentration. For areas with concentrations of low income families, if at least 20% of all households in a geographic area have been determined to be low-income than it has been determined that a concentration exists. . For areas of minority concentration, Section III.C.4.n.(1)(g) defines an "Area of Minority Concentration" as, "...any neighborhood in which: (i) The percentage of households in a particular racial or ethnic minority group is at least 20 percentage points higher than the percentage of that minority group for the housing market area; i.e., the Metropolitan Statistical Area (MSA) in which the proposed housing is to be located; (ii) The neighborhood's total percentage of minority persons is at least 20 percentage points higher than the total percentage of all minorities for the MSA as a whole; or (iii) In the case of a metropolitan area, the neighborhood's total percentage of minority persons exceeds 50% of its population."

Are there any community assets in these areas/neighborhoods?

The census tracts that have been determined to have both high concentrations of poverty and minority contain many different community assets that have been determined by HUD to be qualifying community assets. The following community assets have been identified in many of these areas:

- Life skills and health assets such as educational institutions, early learning centers, and health resources among others
- Community and economic development assets such as production and employment centers
- Recreational assets that create value in a neighborhood beyond work and education
- Physical assets that are associated with the built environment and physical infrastructure (e.g., housing, commercial buildings, and roads)
- Social assets that establish well-functioning social interactions (e.g., public safety and community engagement).

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The Strategic Plan describes the basis for assigning the priorities given to each category of need, identifies goals and obstacles to meeting underserved populations, and discusses accomplishments such as the measurements that the state expects to achieve over the next five years.

The State of Ohio's PY 2020 – 2024 Consolidated Plan includes the following goals for the next five-year period:

- Housing preservation and accessibility
- Affordable housing
- Supportive housing
- Homeless individuals and families
- Community development infrastructure
- Community development facilities
- Community development public services
- Community development health and safety
- Economic development
- Fair housing
- Training and technical assistance

Specific information about the priority needs associated with the goals listed above, the populations served, geographic areas affected and the basis for the priority are included in section SP-25 of the Strategic Plan.

SP-10 Geographic Priorities – 91.315(a)(1)

Geographic Area

Overall, the OCD does not have a geographic targeting strategy. The office does not select areas of the state which will be exclusively awarded funding through a particular program. Local communities determine if funding will be allocated to particular neighborhoods or target specific geographic areas. However, many of OCD's competitive programs prioritize projects and activities that benefit communities with comparatively higher need levels. However, relative differences in local need are only one of many factors in the decision-making process.

The Neighborhood Revitalization grants, offered annually through the Community Development Program, are the most highly geographically targeted funds. CDBG funds that have yet to be determined are targeted to neighborhoods and communities that are 51% or more low or moderate income. These grants are intended to address multiple needs in the community to make a significant impact on the overall quality of life in the area. Below are the 2015 LMI non-entitlement census tracts and block groups throughout the state. Also, the counties, places and townships with greater than 51% LMI populations can be accessed from the OCD website at <https://development.force.com/OCDKnowledgeArticles/s/article/ACS-2011-2015-Low-and-Moderate-Income-Summary-Data>. The Community Development Program overall requires that communities receiving Allocation grants target and expend at least 50% of their funding on local neighborhood target areas and other community needs in their local community development plans. Many of the lower-income areas have also been designated as targeted Investment Areas in their local communities.

It should be noted that not all of these federal funds are available in all areas of the state and some programs have placed limits on funding availability in certain geographic areas, particularly in areas of the state that receive additional direct funding from HUD.

Opportunity Zones

The state's designated Opportunity Zones target many distressed census tracts. Ohio Opportunity Zones are qualified opportunity zones designated by the Federal Statute 26 U.S.C. 1400Z-1. The taxpayer invests cash in the Ohio Qualified Opportunity Fund ("Ohio QOF"), which in turn must invest that money in a Qualified Opportunity Zone property in Ohio. Once the money is invested in the Qualified Opportunity Zone property ("QOZ Property"), the taxpayer is eligible for a non-refundable tax credit equal to 10% of the amount of its funds invested by the Ohio QOF in the QOZ Property. The taxpayer may invest in multiple Ohio QOFs and may receive up to \$1 million in tax credits during the 2020-2021 biennium.

The Ohio Opportunity Zone Tax Credit is applied to the individual income tax, as outlined in the Ohio Revised Code Section 5747.02. The tax credit may be claimed for the taxpayer's qualifying taxable year or the next consecutive taxable year. For the 2020-2021 biennium, a total of \$50 million in tax credit allocation is available.

SP-25 Priority Needs – 91.315(a)(2)

Priority Needs

The following priority needs have been identified through the planning process previously discussed. The priority needs established in this section cover more specific areas associated with the goals that will be discussed in section SP-45 of the Consolidated Plan.

Priority Need Name	Homelessness Prevention and Rapid Rehousing
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	Homeless individuals and families
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Emergency Shelter Operations
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	Homeless individuals and families
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Supportive Housing Data Collection
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	Homeless individuals and families
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Housing for Low-Income HIV/AIDS Clients
Priority Level	High
Geographic Areas Affected	Regional Grantees
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Supportive Services for Low-Income HIV/AIDS Clients
Priority Level	High
Geographic Areas Affected	Regional Grantees
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.

Priority Need Name	Rental Housing Rehabilitation
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	Housing preservation and accessibility
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Owner Housing Rehabilitation
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Rental Housing Repair
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	Housing preservation and accessibility
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Owner Housing Repair
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Homeownership (Down Payment Assistance)
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Tenant Based Rental Assistance
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.

Priority Need Name	Rental Construction
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Homeowner New Construction
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Street Improvements
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Sidewalk Improvements
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Water/Sewer Improvements
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Flood/Drainage Improvements
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.

Priority Need Name	Community Development Parks and Community Centers
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Demolition/Clearance
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Parking Facilities
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Downtown Revitalization
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Public Services
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Economic Development Job Creation
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.

Priority Need Name	Economic Development Fixed Assets Assistance
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Economic Development Off-Site Public Infrastructure Improvements
Priority Level	High
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Fair Housing Activities
Priority Level	Low
Geographic Areas Affected	Statewide
Associated Goals	
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Capacity Building
Priority Level	Low
Geographic Areas Affected	Statewide
Associated Goals	Training and Technical Assistance
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Community Development Planning
Priority Level	Low
Geographic Areas Affected	Statewide
Associated Goals	Training and Technical Assistance
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.
Priority Need Name	Economic Development Low-Income Job Training
Priority Level	Low
Geographic Areas Affected	Statewide
Associated Goals	Training and Technical Assistance
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.

Priority Need Name	General Administration for Grant Implementation
Priority Level	Low
Geographic Areas Affected	Statewide
Associated Goals	Training and Technical Assistance
Basis for Relative Priority	This priority was identified in the Needs Assessment, analysis of the survey, review of public comments and supporting documentation and data from various state agencies and stakeholders.

Priority Needs Summary Table

SP-30

Market Characteristics that will influence the use of funds available for housing type

Tenant Based Rental Assistance (TBRA):

TBRA programs help beneficiaries as opposed to a specific project. Many of the market characteristics that will influence the use of funds available for this particular housing type have been outlined in the Needs Assessment but there are specific conditions as follows that typically must be met in order to influence the use of TBRA.

- 1) The need for Tenant-Based Rental Assistance has been identified as a need through the local planning process, and/or is part of the jurisdiction's local housing strategy, and describes the local market conditions that support the need for this type of assistance; and
- 2) Families or individuals provided with HOME Tenant-Based Rental Assistance are below 60% of the area median income and selected based on either a or b, or c as follows:
 - The Section 8 waiting list of a Public Housing Authority (PHA) operating within the applicant's jurisdiction based on preferences established by the PHA;
 - A waiting list established by the participating jurisdiction based on the established federal Preferences and/or local preferences; or
 - Eligible families that currently reside in units designated for rehabilitation under the HOME Program without requiring them to be placed on the PHA waiting list.

TBRA for Non-Homeless Special Needs:

As discussed in the TBRA housing type, the market characteristics depend primarily on the local need reported, but the following statewide data taken from the 2019 OHFA Needs Assessment helps to illustrate the market characteristics:

- Owner households with a disabled person experience higher rates of housing problems than the state average (22.5 percent,)
- This disparity is most severe among individuals with cognitive limitations.

New Unit Production

Many of the market characteristics that will influence the use of funds available for this particular housing type have been outlined in the Needs Assessment. The creation of new permanent housing to expand the affordable owner-occupied and rental housing stock relies on a number of factors, which are as follows:

In 2018, nearly half (46%) of Ohio's renters experienced housing cost burden, meaning they spent above 30% of their household income on rent and utilities. Almost a quarter of all renter households (24%)

experienced severe housing cost burden, meaning they spend more than 50% of their income on rent and utilities. When housing costs are higher than 30% of a household's income, it limits the household's ability to afford other daily needs, creating real challenges.

These challenges are not just seen in big cities, housing cost burden is a challenge throughout all of Ohio. In every county at least 1 in 8 renter households is severely cost burdened.

Some of this cost burden is related to rising rents. Adjusted for inflation, median gross rent increased by 5% from \$729 per month in the 2008–2012 five-year period to \$764 per month in 2013–2017. While incomes have been rising since the recession, growth in median income has yet to catch up with rent increases. Some of the largest rent increases are in the southeastern and northwestern regions of the state.

Overall, there is a lack of affordable housing for low income renters. There are only 43 available and affordable rental units per 100 ELI renter households. All 88 counties have a shortage of rental housing for ELI renters. Only 14 counties are meeting more than half of local need for ELI renters.

The market conditions related to the construction of new single-family homes is dependent on many factors such as the affordability of constructing new units, eligibility of families, availability of qualified contractors. Homes constructed under this activity must comply with all applicable building/construction codes. If no local codes exist, the unit must comply with the RRS.

Rehabilitation

Many of the market characteristics that will influence the use of funds available for this particular housing type have been outlined in the Needs Assessment. Some of the p

Acquisition, including preservation

Many of the market characteristics that will influence the use of funds available for this particular housing type have been outlined in the Needs Assessment.

SP-35 Anticipated Resources - 91.315(a)(4), 91.320(c)(1,2)

Introduction

At the time of posting for public comments on the draft plan, HUD's allocation to the state had not been released. Once the federal resources are released, they will be included in this section.

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

Of the four programs covered in the Annual Action Plan, three require matching funds. The HOME Program requires a 25% match. For every \$1 of HOME funds expended, the state must provide \$0.25 in matching funds. HOME match will be covered by OHTF dollars and used to projects funded through the HDAP.

Another program that requires matching funds is the ESG Program. For every \$1 of ESG funds expended, the state must provide \$1 of matching funds. This matching requirement will be met by requiring ESG Program applicants to commit matching funds in their applications for funding. No application will be approved that does not contain sufficient matching funds.

Finally, OCD CDBG administration funds expended in excess of \$100,000 must be matched dollar-for-dollar using state funds.

SP-40 Institutional Delivery Structure – 91.315(k)

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

Assessment of Strengths and Gaps in the Institutional Delivery System

Development has taken several steps in the past to strengthen identified weaknesses in its institutional structure and improve local communities and organizations and internal staff's ability to effectively execute housing, economic and community development programs, projects and activities.

As noted previously, the state relies heavily on intermediary agencies to deliver programs and services. In many cases, training and technical assistance activities are provided through intermediary organizations. Such a structure requires ongoing training and technical assistance to communicate program requirements and maintain the broad knowledge base among the people responsible for implementing projects and activities. As part of Development's effort to continually build and expand administrative capacity within the state, Development expects to distribute CDBG and state Ohio Housing Trust Funds to a number of grantees to provide housing, homeless, community development and economic development training and technical assistance throughout the state.

In the past, as noted in the Annual Performance Report submitted to HUD, the state successfully coordinated with organizations by providing training and technical assistance to implement HUD and state-funded programs and services. The state has also coordinated with statewide organizations to effectively carry out housing, economic and community development programs, projects and activities. In addition to maintaining training and technical assistance, the state has recently made efforts to reduce the previously identified gaps by improving and expanding services through promoting regionally oriented service delivery operations.

Below is a list of the training sessions the OCD plans to provide during the Consolidated Plan period. Other training and technical assistance initiatives will likely be offered, but these are the core areas of focus for the OCD during the next five years.

- 1) Program Application and Implementation Trainings. These will be established by each program manager during the year as appropriate. Programs include:
 - Community Housing Impact and Preservation (CHIP) Program
 - Economic Development Program
 - Target of Opportunity Grant Program (CDBG)
 - Residential Public Infrastructure Grant Program
 - Allocation Program
 - Neighborhood Revitalization Grants
 - Homeless Crisis and Response Grant Program
- 2) Training to support Lead-Based Paint Hazard Control:
 - Lead-Safe Renovation (Renovators and Remodelers Training Program)
 - Lead Inspector/Risk Assessor Training
 - Lead Inspector/Risk Assessor Training Refresher
 - Lead Supervisor/ Contractor Training
 - Lead Supervisor/Contractor Training Refresher
 - On-site Technical Assistance
 - EPA Renovation and Remodeling Refresher four-hour update training for those who have previously attended *Lead Safe Renovation Training*. Successful completion of this training qualifies as certification in the EPA RRP training which has been required for all contractors as of May 2010.
- 3) The OCD will partner with agencies to provide comprehensive fair housing training.
- 4) The OCD will continue to provide funds to statewide and regional nonprofits to act as intermediaries that can help groups through program design, provide direct technical assistance and help with fundraising strategies. It is anticipated that the following groups will apply for the funds:
 - Ohio Community Development Corporation Association
 - Coalition on Homelessness and Housing in Ohio
 - Corporation for Ohio Appalachian Development
 - Heritage Ohio, Inc.
 - Ohio Conference of Community Development
- 5) The OCD will continue to offer training and technical assistance by providing funding to intermediary organizations to conduct training and technical assistance activities. Training and technical assistance support may include the following subjects:

- Building nonprofit organization staff's basic and intermediate skills in designing and developing projects.
 - Training and technical assistance for local microenterprise programs.
 - Training on establishing and operating Individual Development Accounts (IDAs).
 - Training for developing and implementing Community Economic Development (CED) strategies.
 - Training and technical assistance for downtown development programs.
 - Training and technical assistance for supportive housing programs.
 - Training and technical assistance on housing development in Ohio's Appalachian area.
 - Training to develop capacity to implement housing development projects.
 - Continue to provide training on the National Main Street approach for extended technical assistance to the Ohio Main Street communities.
 - Continue to provide technical assistance to grantees and applicants for the OCD comprehensive Downtown Revitalization Program through Downtown Assessment Resource Team (DART) visits and community visits as requested.
 - Heritage Ohio will conduct workshops and an Annual Conference.
 - COHHIO will continue to assist with implementing and evaluating the HCRP Program
 - COHHIO will conduct workshops and trainings to increase administrative capacity of agencies that provide assistance to the homeless and near homeless.
- 6) The OCD will continue to develop its Technical Assistance website to include reference and resource material related to program implementation, management and compliance.
 - 7) The OCD will conduct environmental review training.
 - 8) The OCD will develop a revised training for persons who are new to implementing CDBG, HOME, and supportive housing programs.
 - 9) The OCD will conduct training on technical issues related to construction, national objectives, procurement, construction management, planning and innovative project designs.
 - 10) The OCD will continue to work with Ohio Conference of Community Development, Inc. to provide training recommended by its membership.

SP-45 Goals Summary – 91.315(a)(4)

Goals Summary Information

The following Goals have developed as part of the PY 2020 – 2024 Consolidated Plan citizen participation process that began in August 2019. The output measurement data (number of units, linear feet, etc.) are included in the Annual Action Plan that was posted for public comment. The prescribed method for reporting outcomes in IDIS includes the funding sources for each goal and measurement to meet the five-year strategic goals. The Annual Goals and Outcomes are selected from a limited number of Goal Outcome Indicators and Units of Measurements, thus the measurements currently reported differ from the previously reported performance measures in that they are not as specific. The outcomes will be evaluated and compared with the annual stated goals as part of the CAPER prepared and submitted in IDIS.

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing preservation and accessibility	PY2020	PY2024	Affordable Housing	Statewide	Low-income, families and individuals, special needs, elderly,	HOME, CDBG, NHTF	tbd
2	Affordable housing	PY2020	PY2024	Affordable Housing	Statewide	Low-income, families and individuals, special needs, elderly,	HOME, CDBG, NHTF	tbd
3	Supportive housing non-homeless special needs	PY2020	PY2024	Non-Homeless Special Needs	Statewide	Low-income, families and individuals, special needs, elderly,	ESG, HOPWA	tbd
4	Supportive housing for homeless special needs	PY2020	PY2024	Homeless	Statewide	Low-income, families and individuals, special needs, elderly,	ESG, HOPWA	tbd
5	Homeless individuals and families	PY2020	PY2024	Homeless	Statewide	Low-income, families and individuals, special needs, elderly,	ESG	tbd
6	Supportive services	PY2020	PY2024	Non-Homeless Special Needs	Statewide	Low-income, families and individuals, special needs, elderly,	ESG, HOPWA	tbd
7	Community development facilities and infrastructure	PY2020	PY2024	Non-Housing Community Development	Statewide	Low-income, families and individuals, special needs, elderly,	CDBG	tbd
8	Community development public services	PY2020	PY2024	Non-Housing Community Development	Statewide	Low-income, families and individuals, special needs, elderly,	CDBG	tbd

9	Community development health and safety	PY2020	PY2024	Non-Housing Community Development	Statewide	Low-income, families and individuals, special needs, elderly,	CDBG	tbd
10	Economic development	PY2020	PY2024	Non-Housing Community Development	Statewide	Low-income, families and individuals, special needs, elderly,	CDBG	tbd
11	Fair housing	PY2020	PY2024	Other	Statewide	Low-income, families and individuals, special needs, elderly,	CDBG	tbd
12	Training and technical assistance/capacity building	PY2020	PY2024	Other	Statewide	Low-income, families and individuals, special needs, elderly,	CDBG	tbd

Goals Summary Table

SP-50 Public Housing Accessibility and Involvement – 91.315(c)

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

The state does not administer public housing units or oversee housing authorities, but as the civil rights compliance regulations are the same as the OCD housing program regulations, OCD is able to provide direct technical assistance to these agencies upon request.

Activities to Increase Resident Involvements

The state does not administer public housing units or oversee housing authorities, but as the civil rights compliance regulations are the same as the OCD housing program regulations, OCD is able to provide direct technical assistance to these agencies upon request.

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

To the extent the state can determine, and as indicated on HUD's website, there are no troubled housing authorities in Ohio at the present time.

Plan to remove the 'troubled' designation

It is not clear what resources the state could provide to assist a troubled public housing authority, especially prior to an agency's designation as such. Certainly, should a PHA be designated as "troubled", the state would attempt to provide support to the agency.

SP-55 Barriers to affordable housing – 91.315(h)

Barriers to Affordable Housing

As HUD noted in its March 13, 2006 regulations revising the Consolidated Plan requirements, states have less control over barrier removal than entitlement jurisdictions. HUD cited comments by a group representing state community development agencies that it was difficult for states to meet goals for affordable housing barrier removal because states have very minimal control over the major barriers identified by HUD (zoning, local fees, etc.). Zoning and land use decision-making are inherently local processes, subject to a range of influences including market forces and citizen input.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Development has required each of its local Allocation grantees (which cover the entire non-entitlement area of the state) to conduct a local Analysis of Impediments and devise a strategy and a schedule to address barriers and issues impacting housing. These analyses are required to include an assessment of local regulations and policies that may create barriers to creating or accessing affordable housing. Development requires communities to submit their Analysis of Impediments for review. Starting in 2020, communities will be offered assistance to rectify any deficiencies that Development staff identified in these local Analyses of Impediments.

Because Ohio is a "home rule" state, generally the responsibility for adopting and enforcing zoning, subdivision, and housing codes rests with local political jurisdictions. In light of the state's limited regulatory role with respect to these issues, Development's strategy is to provide fair housing and affirmative marketing education and training and technical assistance to local program administrators and officials. These educational and informational efforts will hopefully have a positive effect on preventing regulatory barriers from occurring at the local level.

The state is also working to reduce the number of foreclosures statewide and the resulting vacant and abandoned properties. Ohio has allocated Ohio Housing Trust Fund dollars to local HUD-approved Housing Counseling Agencies across the state to provide foreclosure counseling and provide rescue funds to those potentially facing foreclosure.

SP-60 Homelessness Strategy – 91.315(d)

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

All CoCs in Ohio participate in the HUD-required Point-In-Time (PIT) count and conduct this outreach and counting of both sheltered and unsheltered homeless persons one night during the last 10 days of January. Year-round, various agencies statewide provide outreach services such as day programs, meals, laundry and showers. Some agencies go into homeless encampments to encourage those living there to use available services. Agencies use various assessment tools which collect information about the person's history and needs to create a case management plan that also includes prioritization within the CoC's system.

Addressing the emergency and transitional housing needs of homeless persons

The Office of Community Development awards grants to 77 emergency homeless shelters in 51 counties and 25 transitional housing programs in 17 counties throughout the state. Funded shelters are projected to serve over 30,000 individuals per year and transitional programs almost 3,000. Shelters that operate at capacity year-round exist in both urban and rural areas, and in the winter months, many provide additional overflow mats. Transitional programs are for those who for various reasons require longer-term assistance before being able to maintain permanent housing independently. Faith-based and recovery-oriented programs are also available, though are not tracked by the state's Homeless Information Management System.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

All CoCs in Ohio operate a coordinated intake process, where homeless persons are prioritized based upon a variety of factors including length of time homeless, health, disabilities, age and number of persons in the household. Homeless persons are assessed to determine needs and what programs and services will best meet those needs. Permanent Supportive Housing (PSH) is an option for those with incomes below 35% of AMI and who have one or more disabilities documented by a certified health care professional. PSH projects offer ongoing rent and utilities subsidies and case management services for an unlimited amount of time, depending upon the person's ability to become independent. For those not eligible for PSH, Rapid Re-Housing (RRH) helps with finding housing, landlord relations to overcome barriers such as poor credit and eviction history, case management and financial assistance for deposits, moving costs, and rent and utilities. RRH projects are limited in time with the intent to provide enough services that the household can achieve stability. A challenge in both rural and urban areas is access to affordable housing stock that will pass habitability or Housing Quality Standards. Creative landlord relations programs help increase willingness by landlords to take a chance on persons who present higher risks.

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

When persons request assistance from homelessness programs, agencies attempt avoid homeless by seeking solutions that will allow the persons to stay in their current housing or find housing with friends or family. Homelessness Prevention Programs provide emergency financial assistance for rent and utilities to help persons

avoid homelessness. Regulations do not allow for Homelessness Prevention services to be provided to persons who are in institutions or doubled up with other households, and Rapid Re-Housing is only allowed for those who are literally homeless.

SP-65 Lead based paint Hazards – 91.315(i)

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

The OCD is proposing the following activities to address lead-based paint hazards:

- 1) Development will require grantees to follow the Lead-Based Paint Guidelines in the attached Consolidated Plan grantee unique appendices.
- 2) The OCD developed a chapter within its Housing Standards, the Residential Rehabilitation Standards (RRS), that addresses lead-based paint. The OCD will require all grantees undertaking housing rehabilitation activities to meet these standards.
- 3) The OCD will continue to provide funding for locally administered housing rehabilitation programs, which are expected to rehabilitate about 1,000 owner units and 125 renter units. Housing units that undergo rehabilitation are required to be made lead-safe.
- 4) The OCD will provide training and technical assistance for local program staff and local lead hazard mitigation personnel, which will include the following activities:
 - Make the Remodelers and Renovators Training Program available to contractors and workers throughout the state, and especially in areas served by the CHIP Program. The OCD will continue to use Training and Technical Assistance funds to keep the training sessions affordable to housing rehabilitation contractors.
 - Provide affordable training for Lead Risk Assessors and Lead Clearance Technicians, as needed, especially for persons who are implementing local CHIP grant activities.
 - Provide on-site technical assistance to local CHIP grantees through a third-party contractor/trainer.
 - The OCD will provide other forms of training and technical assistance support to local programs and hazard control personnel. This may include further specialized training sessions for housing program administrators, as well as preparing and distributing training materials. The OCD will continue to maintain current reference information on its Technical Assistance website at <https://development.force.com/OCDKnowledgeArticles/s/article/Required-Grantee-Training>.
- 5) The OCD will explore other funding sources that could assist local communities, nonprofit organizations or contractors to address lead-based paint hazards. This will include coordinating efforts with the Ohio Department of Health to identify funding sources that can assist low- and moderate-income households in paying for lead hazard mitigation costs, especially in housing units where a lead hazard control order has been issued by the Ohio Department of Health. This may include applying for a HUD Lead Hazard Control Grant.
- 6) Maintain lines of communication with federal, state and local agencies and organizations involved with the lead-based paint issues and activities
- 7) Continue reporting the total number of units that have been made lead-safe as part of the performance measurement system.

In addition to the programs and service offered by Development, OHFA, and ODH, a number of other state agencies instituted statewide programs that deal specifically with addressing the lead issue. The following table provides the program name, estimates of population to be served, service area and eligibility requirements:

Program	# or Target Population Served	Area served	Eligibility criteria
HUD Lead Hazard Control Program	185 properties remediated (over 42-month grant period); 250 risk assessments performed	21 Ohio counties	Child <6 years of age residing or visiting home Income must be ≤ 80% Area Median Income (AMI)

Program	# or Target Population Served	Area served	Eligibility criteria
SCHIP Lead Hazard Control Program	~ 150 properties remediated per year; 175 risk assessments performed	Statewide	Medicaid eligible child ≤ 19 years of age or pregnant woman residing or visiting home built before 1978
Public Health Lead Investigation Program	2,737 children with EBL 5-≤9 µg/dL* 1,119 children with EBL ≥ 10 µg/dL* (897 onsite investigations performed)	Statewide (11 delegated local health departments)	Must have an elevated blood lead level -Child with EBL 5-≤9 µg/dL receive preventive services by phone and a referral for early intervention services -Child with EBL ≥ 10 µg/dL receive an onsite lead investigation and lead risk assessment, if needed
Case Management and Health Promotion	Children with elevated blood lead levels at or above 5 µg/dL	Statewide (Case managers at 95 local health departments)	Access to case management services and provided with a cleaning kit to remove lead-contaminated dust from the child's environment
Lead-Safe Rental Registry	Families in search of lead-safe rental housing	Statewide	Property owners voluntarily register rental properties after lead-safe practices are completed and a clearance examination passed
High Efficiency Particulate Air (HEPA) Vacuum Loaner Program	Families with children	68 HEPA Vacuums available for loan through Ohio health departments and housing programs	Any family in need of a HEPA vacuum for cleaning lead-contaminated dust

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

The following guidance is provided to assist housing projects or programs using federal or state funds awarded through Development's programs:

- Regardless of any information provided in these guidelines, grantees must follow all existing federal, state or local laws, regulations and procedures concerning lead-based paint. Awareness and adherence to these regulations is the responsibility of the agency performing or contracting for housing rehabilitation activities. Procedures for distributing information on lead-based paint hazards, including appropriate disclosure notices, must be integrated into any and all housing-related activities.
- Local communities must develop local strategies for addressing lead-based paint in housing. This strategy needs to include policy on units with children who have Elevated Blood Lead levels, which, pursuant to the provisions of H.B. 248, requires lead hazard controls be applied by licensed lead abatement contractors.

- Except where all lead-based paint is removed, if lead hazard mitigation activities are performed on renter-occupied units financed with HUD funds or other funds covered by these policy guidelines, the owner of the units must incorporate a schedule of lead-based paint maintenance activities into regular building operations consistent with 24 CFR Part 35.935.
- If state funding is used to directly assist housing projects or activities constructed prior to 1978, both state regulatory requirements and 24 CFR Part 35 must be followed. (Direct state assistance excludes state bond financing, state or federal tax-credits, and pre-development assistance, unless federal assistance is also involved.)
- Agencies involved in lead-based paint hazard mitigation are encouraged to coordinate efforts with local governments, state and local health departments, Community Action Agencies, other nonprofit organizations, local housing authorities and private sector organizations wherever possible.

In addition to the efforts that Development plans to undertake as stated above, Ohio's State Health Improvement Plan (SHIP) 2020- 2022 recognizes that environments in which people live, work, learn, and play all have an impact on an individual's health. Non-traditional health partners, such as Housing, Environment, Community Development, and Energy have a role in good health outcomes. In Ohio 13 state agencies and other non-traditional health partners participated in developing the SHIP. Health in All Policies is a collaborative approach that incorporates health into all decision making across agencies and service providers. The decade-long partnership between Development and the Ohio Department of Health is at the core of all policies statewide that address an individual's health with where they live, work, and play.

SP-70 Anti-Poverty Strategy – 91.315(j)

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

In Ohio, H.B. 408 initiated welfare reform, known as Ohio Works First (OWF). OWF seeks to transition clients to self-sufficiency by placing a strong emphasis on obtaining and retaining paid employment. In addition to its many implications for OWF participants in terms of an emphasis on self-sufficiency through employment, new eligibility criteria and time limits, H.B. 408 contains many provisions that significantly change the way the Ohio Department of Job and Family Services (ODJFS), and county agencies, particularly county Departments of Human Services, conduct business.

The ODJFS provides a seamless system for providing services to people looking for jobs and employers looking for workers. The ODJFS also collaborates with Development and the Departments of Education and Higher Education. These agencies will work directly with business and labor on workforce development activities. The ODJFS also administers the Prevention, Retention, and Contingency (PRC) Program, which is an integral part of Ohio's welfare reform efforts. Ohio's PRC Program provides work supports and other services to help low-income parents overcome immediate barriers to employment. It is funded through the federal Temporary Assistance for Needy Families program. Those receiving assistance from other public assistance programs – including Disability Financial Assistance and the Supplemental Nutrition Assistance Program, also may be eligible for PRC services. Benefits and services are available for certain low-income families who need short-term help during a crisis or time of need, which includes parents of children under 18, including noncustodial parents if they live in Ohio and pregnant women or teens. A list of PRC quarterly reports that includes both statewide and county-level information can be found at <http://jfs.ohio.gov/ofs/DMRS/PRC/PRC1.stm>.

Through programs established by Development and through coordination with many of the efforts listed above, there are several systems in place to address this particular issue. The Consolidated Plan Annual Performance Report provides the number of contracts awarded to Section 3 businesses reported in the previous program year with HOME and CDBG funding, which includes contracting with businesses in low-income areas. ESG funding through the Homeless Crisis Response Program can provide financial assistance including rental assistance; rental application fees; rental arrears; security and utility deposits; utility payments; moving cost assistance and, in certain circumstances, motel and hotel vouchers. Housing Relocation and Stabilization Services, which includes case management; outreach and engagement; housing search and placement services; legal services and credit repair, are also eligible. HOPWA funding can provide limited case management, transportation and day care.

SP-80 Monitoring – 91.330

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

The OCD conducts monitoring visits at least once prior to grant close out. Also, both the OCD and OHFA staff provide technical assistance to CHIP and HDAP grantees, either via telephone, meetings at the state offices, or, if warranted, via site visits. Most post-award, onsite technical assistance is provided to CHIP grantees whose programs sometimes involve activities that are new to the local program or involve new local staff. HDAP grants are for projects, rather than programs, and are typically implemented by agencies that have considerable housing development experience. Thus, there is not a significant need for onsite, post-award technical assistance in most HDAP projects. The Community Investments Section also meet with CDBG Allocation grantees before application submission to ensure eligibility and national objective compliance. Generally, staff conducts a minimum of 30 monitoring/technical assistance visits during the program year (July 1 – June 30). Also, on a calendar year basis, Development’s Office of Audit conducts financial audits of selected grant recipients. The OCD provides the Office of Audit with a selected list determined by each section supervisor based on grant size and grant and program complexity. The Office of Audit adds several recipients based on random selection of receipts and grant disbursements.

Monitoring Procedures

Monitoring visits examine some selected activities to determine that:

- Activities meet the OCD, state and/or HUD requirements.
- Communities are managing projects in a timely and responsible manner.
- Communities are implementing activities outlined in the application and grant agreement.

The visit is not intended to be a comprehensive, in-depth audit of all activities and programs undertaken by the grantee, nor do staff resources permit such an approach. Site visits are selected based on empirical evidence reviewed by management and community development/housing specialists regarding grantees’ expertise, program complexity or number of grants administered by a particular recipient. The staff will monitor certain programmatic areas based on previous findings in that specific area or if the particular programmatic function has not been monitored in the past few years.

If the initial review by an OCD staff member uncovers specific problem areas, a program specialist (financial, procurement, acquisition/relocation, etc.) will be sent to conduct a detailed review of a particular program area.

After a monitoring visit, the staff person must conduct an exit conference with the grantee to review the monitoring results and describe any deficiencies found during the monitoring visit. Within 45 days following a monitoring visit, the staff person prepares a monitoring report that the section supervisor reviews. All monitoring tools and work papers must be placed in the Central File. Grantees have 30 days to respond to the monitoring report and are required to respond if the staff person lists a “finding” in the report.

A computerized monitoring tracking system enables the OCD staff to quickly determine problem areas and/or grantees that need monitoring as well as tracking to ensure that all grants are monitored prior to close out.

Monitoring Standards

There are two types of determinations that can be made due to a monitoring visit:

A “Finding” is a deficiency that is a direct law/regulation or grant agreement violation (which incorporates the application documents and attendant commitments). It also is insufficient documentation that substantiates the grantee followed grant or statutory requirements. All findings require the grantee to respond to and rectify the cited deficiency.

An “Advisory Concern” is not a violation, but any deficiency that may eventually lead to a violation and “finding”. It is the OCD staff person’s responsibility to track the outstanding findings and advisory concerns. If the grantee has not responded within the appropriate time, staff must contact the grantee in writing with follow-up letters until all issues are resolved.



Development
Services Agency

Amended Program Year 2020 Ohio Consolidated Plan Annual Action Plan

July 2020

Prepared By:
Ohio Development Services Agency
Community Services Division
Office of Community Development

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Attachments

- A – Other Resources**
- B – Executive Summary**
- C – Ohio Housing Finance Agency National Housing Trust Fund Allocation Plan**
- D – Ohio Development Services Agency National Housing Trust Fund Allocation Plan**

Introduction

The State of Ohio is required to prepare and submit an Annual Action Plan as part of the Five-Year Consolidated Plan to the U.S. Department of Housing and Urban Development (HUD), pursuant to regulations stated in 24 CFR 91.320, to access certain types of HUD funds. The purpose of the Annual Action Plan is to describe the programs and activities that the Ohio Development Services Agency's (Development) Office of Community Development (OCD) will administer with Federal Program Year 2020 HUD and State Fiscal Year 2021 awarded funds. The program year for Program Year (PY) 2020 funded activities begins on July 1, 2020 and ends June 30, . The Annual Action Plan must cover five (5) HUD programs, including the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships Program (HOME), the National Housing Trust Fund (NHTF), the Emergency Solutions Grant (ESG) Program, and the Housing Opportunities for Persons with AIDS (HOPWA) Program. HUD awards funding from these to the state which are then distributed by OCD. The OCD has established a variety of programs for distributing the HUD and state funds. Each of the programs and activities proposed for PY 2020 are described in detail in the Consolidated Plan with the proposed funding amounts.

PY 2020 Citizen Participation and Consultation Process

The OCD completed several activities designed to obtain comments, perspectives, and citizen opinions to prepare the PY 2020 Ohio Consolidated Plan Annual Action Plan. The OCD provided notice of all public hearings and meetings at least ten (10) days before the meetings through newsletters, public media advisories, direct mail, and postings on Development's website at http://development.ohio.gov/cs/cs_ocrp.htm. Records of these actions and documentation are available for review at the OCD office between 8 a.m. and 5 p.m. at 77 South High Street, 26th Floor, Columbus, Ohio. All facilities and meeting times selected as part of the citizen participation process were chosen to accommodate persons with disabilities. The specific citizen participation activities are described as follows:

1. Public Hearing on Needs

The OCD held a public hearing on needs issues on September 12, 2019, in Room 1932 at 77 South High Street, 19th Floor, Columbus, Ohio. The OCD mailed Notification of the Public Hearing on Needs information to local communities, organizations, and agencies throughout the state at least 30 days in advance of the hearing date. Development also published the notification on its website. The notification summarized the state's planning process for the Ohio Consolidated Plan Annual Action Plan and solicited participation in OCD's Program Advisory Committee meetings. The OCD accepted written comments on needs issues for 15 days from August 30, 2019 to September 15, 2019. Comments made at the Public Hearing on Needs, or received by OCD prior to the hearing's conclusion, were distributed to the advisory committee members for consideration during the planning process.

2. Consolidated Plan Needs Surveys

In addition to the Public Hearing on Needs and related comment period, OCD solicited feedback through a public survey on Development's Ohio Consolidated Plan page (http://development.ohio.gov/cs/cs_ocrp.htm) on August 30, 2019, to determine the community/economic development, affordable housing, and supportive housing needs across the state.

3. Program Advisory Committees

The ***PY 2020-2024 Ohio Consolidated Plan Program Advisory Committee (PAC)*** meetings provide an opportunity for stakeholders and the public to discuss and comment on specific policies and requirements pertaining to current OCD-administered programs. The following meetings took place following the Needs public comment period.

On October 11, 2019, OCD held the Housing Assistance Grant Program Advisory Committee meeting in Room 104 at the [Ohio Emergency Management Agency](#) in Columbus, Ohio.

On October 28, 2019, OCD held the Fair Housing Program Advisory Committee meeting in Room 1960 of the [Riffe](#) Center in Columbus, Ohio.

On November 4, 2019, OCD held the Community Housing Impact and Preservation and Housing Assistance Grant Program Advisory Committee meeting in Room 204 at the [Ohio Emergency Management Agency](#) in Columbus, Ohio.

On November 5 and 6, 2019, OCD held the following PAC meetings at the [State Library of Ohio](#) in Columbus, Ohio.

- Supportive Housing and Homelessness Programs;
- Housing Opportunities for Persons with AIDS (HOPWA) Program;
- Community Development Programs, Economic Development Loan and Infrastructure Program; and
- Fair Housing.

On November 7, 2019, the Housing Development Assistance Program PAC meeting was held during the Ohio Housing Finance Agency's Annual Conference.

4. Notification of Public Comment Period and Distribution of Plan

On January 31, 2020, OCD sent notification to local communities, agencies, and organizations, informing them that the Draft PY 2020 – 2024 Consolidated Plan Draft PY 2020 Ohio Consolidated Plan Annual Action Plan, Executive Summary and National Housing Trust Fund Allocation Plan was to be made available on Development's website at http://development.ohio.gov/cs/cs_ocp.htm for review and comment. This notification announced the beginning of the mandatory 30-day public comment period on the draft plan, including a public hearing that was originally scheduled for March 19, 2020, at 10:30 a.m. at 77 South High Street, Room 1932, Columbus, Ohio. Due to the COVID-19 state of emergency the public hearing was carried out from April 13, 2020 to April 24, 2020. The updated memo can be found at https://development.ohio.gov/cs/cs_ocp-public-comment.htm. All comments received will be included, along with responses, in the final PY 2020 Ohio Annual Action Plan and National Housing Trust Fund Allocation Plan submitted to HUD.

Due to the fact that the NHTF allocation was released following the PY 2020-2024 Ohio Consolidated Plan public hearing and comment period, the NHTF Allocation Plan is required to be posted with the final allocation awarded to the state of Ohio included and submitted as a substantial amendment to the state of Ohio's PY2020-2024 Consolidated Plan.

The PY 2020 NHTF Allocation Plan was released for the public comment period on May 25, 2020, and was the subject of a Public Hearing on May 26, 2020 at 10:30 a.m. The final draft will be submitted to HUD following the public comment period. No comments were received regarding the PY2020 NHTF Allocation Plan during the comment process.

Submission to HUD

The final Ohio Consolidated Plan Annual Action Plan document has been submitted via the Integrated Disbursement Information and Information Systems (IDIS) to HUD for a 45-day review period. The OCD will provide notice to local communities, agencies, and organizations throughout the state that the final PY 2020 - 2024 Ohio Consolidated Plan and PY 2020 Annual Action Plan are available.

Expected Resources

The federal resources allocated to the state from HUD are listed below. The OCD and the Ohio Housing Finance Agency (OHFA) have established a variety of programs through which these funds will be distributed. Table 1 displays how these federal funding sources will be distributed among the various OCD and OHFA programs. Following Table 1, the guidelines for each program are described in detail.

\$46,400,532	Community Development Block Grant (CDBG) Program
\$24,332,971	HOME Investment Partnerships (HOME) Program
\$6,184,045	Emergency Solutions Grant (ESG) Program
\$8,755,082	National Housing Trust Fund (HTF) Program
\$12,305,000	CDBG-DR
\$1,225,000	RHP
\$2,121,114	Housing Opportunities for Persons With AIDS (HOPWA) Program
<hr/>	
\$101,323,744	Total Federal PY 2020 Funds

The OCD and OHFA have established several policies on how these funds can be used. These policies are listed below for each of the five (5) respective HUD funding sources.

CDBG Program:

The following policies will apply to PY 2020 CDBG funds:

- 1) The amount of administrative funds may be slightly higher than the amount listed above, if the base for the state's administrative cap includes program income. Also, the amount for administration shown on Table 1 covers only OCD general administration. Grantees may be awarded additional administrative funds for local administrative costs associated with CDBG programs. Also, pursuant to guidelines issued by HUD, CDBG administrative funds will be used for HOME Program administrative costs incurred by local HOME grantees. The OCD and local CDBG program administration cannot exceed 20% of the total CDBG allocation;
- 2) The funds budgeted for the Training and Technical Assistance Program are from the 3% allowance for technical assistance. CDBG funds will be available for the Training and Technical Assistance Program;
- 3) The state will distribute recaptured funds for the same type of program activities from which the recaptured funds are derived and for which they were originally programmed; and
- 4) PY 2020 CDBG funds that are not committed by March 31, 2021, may be transferred to another CDBG program at OCD's discretion to meet CDBG timeliness requirements.

If the total PY 2020 CDBG allocation to the state does not equal the exact amount that the state expects to receive, OCD will allocate available state funds proportionately, based on the PY 2020 proposed budget amounts as shown on Table 1.

HOME Program:

The following policies will apply to PY 2020 HOME funds:

- 1) The 10% HOME share of administrative funds will be used for both Development and HOME Program administrative costs incurred by state-funded HOME grantees.
- 2) If the total PY 2020 HOME allocation to the state does not equal the exact amount that the state expects to receive, the OCD will allocate funds proportionately, based on the PY 2020 proposed budget amounts, as follows:

• Community Housing Impact and Preservation Program	58%
• Housing Development Assistance Program	28.7%
• CHDO Competitive Operating Grant Program	.4%
• Administration	9.6%

NHTF:

The following policies will apply to PY 2020 NHTF funds:

- 1) The NHTF Program allocations assume that the state will receive approximately \$8.1 million in PY 2020 NHTF Program funds from HUD; and
- 2) No more than 10% of federal NHTF funds will be used for administrative costs.

ESG Program:

The following policies will apply to PY 2020 ESG funds:

- 1) The ESG Program allocations assume that the state will receive approximately \$6.1 million in PY 2020 McKinney-Vento Emergency Solutions Grant Program funds from HUD;
- 2) No more than 7.5% of federal ESG funds will be used for administrative costs, and of that, 60% distributed to grant recipients and 40% to the OCD.

HOPWA Program:

The following policies will apply to PY 2020 HOPWA funds:

- 1) Of the amount allocated for the HOPWA Program, approximately \$4,000 will be used for OCD general administration; local grantees may use any remaining funds for local HOPWA Program general administration.

Federal Low-Income Housing Tax Credits

The State of Ohio expects to receive \$24 million in tax credits through the Low-Income Housing Tax Credit Program in the upcoming year. The tax credits can be used to generate equity that must be used to partially or fully finance developing affordable rental housing projects. The Ohio Housing Credits are administered through OHFA, and often used in conjunction with federal HOME or Ohio Housing Trust Fund (OHTF) gap funding and private dollars to finance affordable rental housing projects.

Other Resources

Several OCD programs will combine federal funds with OHTF, as indicated on Table 1. Final OHTF allocations must be approved by the OHTF Advisory Committee and grant awards are contingent on approval by the state Controlling Board. Additionally, the OCD expects several federal, state, and private resources to be made available during PY 2020 that local communities and nonprofit organizations used in the past to fund housing- and community development-related activities. It would be extremely difficult to state the exact funding amounts from these sources. Instead, a series of tables are included that indicate the sources of other funds expected to be made available for the three (3) major program areas covered in the Consolidated Plan. Specifically, Attachment D shows the sources of other funds expected to be made available for housing activities, as well as resources for economic development and community development programs, respectively.

Matching Funds

Of the four programs covered in the Annual Action Plan, three require matching funds. The HOME Program requires a 25% match. For every \$1 of HOME funds expended, the state must provide \$0.25 in matching funds. HOME match in PY 2020 will be covered by OHTF dollars used in conjunction with projects funded through the HDAP.

Another program that requires matching funds is the ESG Program. For every \$1 of ESG funds expended, the state must provide \$1 of matching funds. This matching requirement will be met in PY 2020 by requiring ESG Program applicants to commit matching funds in their applications for funding. No application will be approved that does not contain the required amount of matching funds.

Finally, the OCD CDBG administration funds expended in excess of \$100,000 must be matched dollar-for-dollar using state funds.

Revised FY 2020 Consolidated Plan Program Summary

Programs	Federal And State Funds Total	Pct. of Total	Consolidated Plan Total ⁽¹⁾	Pct. of Total	Funding Sources							
					1	2	3	4	5	6	7	8
					Federal	Federal	Federal	Federal	Federal	Federal	Federal	State
					CDBG	HOME	NHTF	ESG	HOPWA	RHP	CDBG-DR	OHTF ⁽²⁾
Community Housing Impact and Preservation Program	\$ 23,769,750	16.2%	\$ 23,769,750	23.5%	\$ 8,500,000	\$ 14,100,000					\$ 1,169,750	
Housing Assistance Grant Program	\$ 4,000,000	2.7%	\$ -	0.0%								\$ 4,000,000
Housing Development Assistance Program ⁽²⁾	\$ 37,420,000	25.6%	\$ 25,420,000	25.1%		\$ 7,000,000	\$ 7,900,000				\$ 10,520,000	\$ 12,000,000
CHDO Competitive Operating Grant Program	\$ 100,000	0.1%	\$ 100,000	0.1%		\$ 100,000						
Affordable Housing Subtotal	\$ 65,289,750	44.6%	\$ 49,289,750	48.6%	\$ 8,500,000	\$ 21,200,000	\$ 7,900,000	\$ -	\$ -	\$ -	\$ 11,689,750	\$ 16,000,000
Homeless Crisis Response Grant Program ⁽³⁾	\$ 20,104,400	13.7%	\$ 5,750,000	5.7%				\$ 5,750,000				\$ 14,354,400
Supportive Housing Grant Program	\$ 9,315,600	6.4%	\$ -	0.0%								\$ 9,315,600
Housing Opportunities for Persons With AIDS	\$ 2,121,114	1.4%	\$ 2,121,114	2.1%					\$ 2,121,114			
Recovery Housing Pilot	\$ 1,225,000	0.8%	\$ 1,225,000	1.2%						\$ 1,225,000		
Homelessness & Supportive Housing Subtotal	\$ 32,766,114	22.4%	\$ 9,096,114	9.0%	\$ -	\$ -	\$ -	\$ 5,750,000	\$ 2,121,114	\$ 1,225,000	\$ -	\$ 23,670,000
Community Development Program ⁽⁴⁾	\$ 24,400,000	16.7%	\$ 24,400,000	24.1%	\$ 24,400,000							
Economic Dev. & Public Infrastructure Program	\$ 10,000,000	6.8%	\$ 10,000,000	9.9%	\$ 10,000,000							
Community & Economic Development Subtotal	\$ 34,400,000	23.5%	\$ 34,400,000	34.0%	\$ 34,400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Target of Opportunity Grant Program	\$ 2,000,000	1.4%	\$ 2,000,000	2.0%	\$ 2,000,000	\$ -		\$ -				
Special Projects Grant Program	\$ 730,000	0.5%	\$ -									\$ 730,000
Shelter Repair Target of Opportunity Program	\$ 100,000	0.1%	\$ -									\$ 100,000
Training and Technical Assistance Funds	\$ 300,000	0.2%	\$ 300,000	0.3%	\$ 300,000							
CDC 5% Set-Aside	\$ 2,000,000	1.4%	\$ -	0.0%								\$ 2,000,000
Resident Services Coordinator Program	\$ 262,500	0.2%	\$ -	0.0%								\$ 262,500
Program Administration	\$ 8,475,380	5.8%	\$ 6,237,880	6.2%	\$ 1,200,532	\$ 3,132,971	\$ 855,082	\$ 434,045	\$ -		\$ 615,250	\$ 2,237,500
Totals =	\$ 146,323,744	100%	\$ 101,323,744	100%	\$ 46,400,532	\$ 24,332,971	\$ 8,755,082	\$ 6,184,045	\$ 2,121,114	\$ 1,225,000	\$ 12,305,000	\$ 45,000,000

(1) The "Consolidated Plan Total" column includes the CDBG, HOME, ESG, NHTF and HOPWA funds awarded to the State of Ohio.

(2) OHTF allocations are contingent upon approval by the OHTF Advisory Committee and the Director of the Development Services Agency. Further, OHTF grant awards are contingent upon Controlling Board approval.

OHFA administers the HDAP, ODA will administer the Resident Services Coordinator Program, and Ohio CDC will administer the Microenterprise Business Development Program.

Therefore, in addition to program funds, OHFA will receive HOME and OHTF administrative dollars and ODA will receive OHTF administrative dollars.

(3) The Homeless Crisis Response Grant Program includes the OHTF funding set asides required by ORC Section 174.02 and unrestricted OHTF dollars.

(4) The Community Development Program includes the funding allocation for the Formula Allocation and two set asides; Neighborhood Revitalization Grants and Critical Infrastructure grants.

(5) Approximately 60% of the HOME and 70% of the ESG administration allocation will be awarded to grant recipients.

Ohio Consolidated Plan Annual Action Plan Allocation Priorities

Table 2 below includes the PY 2020 budget allocations. This chart is provided pursuant to HUD's requirement that the Consolidated Plan contain a statement of the state's allocation priorities and the reasons for such priorities. The program goals indicate how a particular need will be addressed and the basis for allocation column references a section in the Consolidated Plan where the particular need is identified and discussed. Because these needs were examined in the 2020-2024 Consolidated Plan Strategy, references to that document are cited rather than restated. The 2020-2024 Consolidated Plan Needs Statement can be obtained from the OCD and is also available online at http://development.ohio.gov/cs/cs_ocp.htm.

Table 2: State of Ohio PY 2020 Allocation Priorities

Programs	PY 2020 Allocations	Program Goals	Basis For Allocation
Homeless and Supportive Housing	\$9,096,114		
Homeless Crisis Response Program	\$5,750,000	To provide a continuum of housing/services to prevent persons from becoming homeless by providing homelessness prevention services and assistance; move persons from homelessness to permanent housing through the provision of housing placement, emergency shelter, direct housing, and transitional housing; and provide long-term permanent supportive housing to homeless persons with disabilities.	Ohio 2020-2024 Consolidated Plan Strategy. The allocation is determined by HUD ESG funds.
Housing Opportunities for Persons With AIDS	\$2,121,114	To provide eligible non-profit organizations or units of local government with funds to devise long-term, comprehensive strategies for meeting the housing and supportive service needs of persons with AIDS or HIV-related diseases.	The state allocation for the HOPWA Program is the amount of funds allocated by HUD.
Recovery Housing Pilot	1,225,000	To provide housing assistance to areas that were impacted by the 2019 tornadoes.	The federal disaster declarations made in 2019.
Affordable Housing	\$30,500,000		
Community Housing Impact and Preservation Program	\$22,600,000	To partner with Ohio communities to preserve and improve the affordable housing stock for low- and moderate-income Ohioans and strengthen neighborhoods through community collaboration.	Ohio 2020-2024 Consolidated Plan Strategy.
Housing Development Assistance Program (HDAP)	\$14,900,000	To support the capacity of housing development organizations and to provide financing for eligible housing projects to expand the supply of decent, safe, affordable housing for very low-income to moderate-income persons and households in the state of Ohio.	Ohio 2020-2024 Consolidated Plan Strategy.
CHDO Competitive Operating Grant Program	\$100,000	To provide limited operating support to organizations to continue affordable housing development and to provide capacity building opportunities to new organizations.	Capacity building for implementation of HDAP Projects.

(continued on next page)

Table 2: State of Ohio PY 2020 Allocation Priorities

Programs		PY 2020 Allocations		
Community and Economic Development		\$34,400,000	Program Goals	Basis For Allocation
	Community Development Program	\$24,400,000	To provide communities with a flexible housing and community development resource that can be used to address locally identified needs that are eligible CDBG activities and qualify under the national objective of Low- and Moderate-Income Benefit or Elimination of Slum and Blight.	Ohio 2020-2024 Consolidated Plan Strategy.
	Economic Development & Public Infrastructure Program	\$10,000,000	To create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through the expansion and retention of business and industry in Ohio communities. The creation of a safe and sanitary living environment for Ohio citizens, through the provision of safe and reliable drinking water and proper disposal of sanitary waste.	Ohio 2020-2024 Consolidated Plan Strategy.
Other Programs		\$2,300,000	Program Goals	Basis For Allocation
	Target of Opportunity Grant Program	\$2,000,000	To provide a means to fund worthwhile "targets of opportunity" projects and activities that do not fit within the structure of existing programs, and to provide supplemental resources to resolve immediate and unforeseen needs.	Based on identified community needs and historical demand for funds.
	Training and Technical Assistance Funds	\$300,000	To provide technical assistance to local governments and nonprofit program recipients, and to provide funds to intermediary organizations to conduct training and technical assistance activities.	

Housing, Shelter and Supportive Housing

- **Community Housing Impact and Preservation Program**
- **Housing Assistance Grant Program**
- **Housing Development Assistance Program**
- **Community Housing Development Organization Operating Grant Program**
- **Homeless Crisis Response Program**
- **Supportive Housing Program**
- **Housing Opportunities for Persons with AIDS Program**

Community Housing Impact and Preservation (CHIP) Program

Goal: Through an efficient and impactful approach, the Community Housing Impact and Preservation (CHIP) Program will partner with Ohio communities to preserve and improve the affordable housing stock for low-to-moderate income Ohioans and strengthen neighborhoods through community collaboration.

Total Funds: Approximately \$20.6 million: Approximately \$8.5 million in CDBG funds will be combined with an estimated \$14.1 million of HOME Investment Partnerships Program funds and SFY 2021 Ohio Housing Trust Funds (to be determined). CHIP Program funds will be distributed in one competitive funding round.

Eligible Jurisdictions: Jurisdictions are eligible for PY 2020 CHIP Program funding if they have an approved CHIP Policy and Procedures Manual. Eligible jurisdictions are listed in Table 3.

Note: Under Section 703.06 of the Ohio Revised Code, the Ohio Secretary of State's office reviews the 10-year Census report and verifies the population totals of all municipalities and villages. The full listing of all city and village classifications can be viewed at https://ohioroster.ohiosos.gov/muni_townships.aspx.

- 1) Non-entitlement/non-participating jurisdictions (cities with a low-to-moderate income population at or above 25% and all counties) with an approved CHIP Policy and Procedures Manual (eligible to receive CDBG, Ohio Housing Trust Fund and HOME funds);
- 2) Non-entitlement jurisdictions (cities with a low-to-moderate income population at or above 25%, and all counties in the state) that are part of a participating jurisdiction consortium, as defined by the HOME Program regulations, with an approved CHIP Policy and Procedures Manual (eligible to receive OHTF and CDBG funds). Jurisdictions with an allocation of more than \$400,000 per year from HUD are eligible for a maximum CHIP Program award of \$250,000. The remaining jurisdictions must refer to "Grant Ceiling, *Maximum Award - Option 2*".
- 3) Entitlement/non-participating jurisdictions (cities with a low-to-moderate income population at or above 25% and all counties in the state) with an approved CHIP Policy and Procedures Manual (eligible to receive HOME funds). Jurisdictions with an allocation of more than \$400,000 per year from HUD are eligible for a maximum CHIP Program award of \$250,000. The remaining jurisdictions must refer to *Grant Ceiling, Maximum Award - Option 2*.

Jurisdictions awarded a two-year grant with PY 2019 CHIP Program funding as an applicant or partner are not eligible to apply until PY 2021.

Grant Ceiling: Through a competitive application process, jurisdictions may apply for a maximum award as follows:

	Maximum Award	
	Option 1	Option 2
County	\$ 300,000	\$ 400,000
City with a population of at least 15,000	\$ 250,000	\$ 350,000
City with a population between 5,000 and 14,999	\$ 200,000	\$ 300,000

CHIP Program-eligible jurisdictions are incentivized to collaborate to form a partnership (see below for Partnership Composition). Partnership applicant jurisdictions may apply for the maximum award detailed in Option 2 above. Additionally, points associated with partnership development will be awarded when scored for funding. The maximum award for each partnership cannot exceed the aggregate maximum total amount of each CHIP Program-eligible jurisdiction in the partnership as detailed in Option 2 above. Regardless of the number of communities in the partnership, the maximum grant request cannot exceed \$1.6 million.

Jurisdictions who choose to apply as a single-jurisdiction applicant, must refer to Option 1 for maximum grant award. Points associated with partnership development will not be awarded when scored for funding.

The following applicants may apply as a single-jurisdiction for the maximum award under Option 2 in the chart above and receive points associated with partnership development when scored for funding:

- Counties without eligible cities,
- Cities with an opt-out County (see Partnership Composition), or
- Cities within an ineligible County.

Grant Request Reduction: The OCD reserves the right to award competitive grants at amounts lower than requested in the application. Grant awards could be lower than requested due to funding availability, application rating, capacity and performance.

Partnership Composition: Parameters for developing a partnership are as follows:

- A partnership's boundaries cannot exceed two adjacent counties.
- An eligible city can only partner within its own county, either with the county or another CHIP Program-eligible city within the county. In a scenario where the city is an applicant and its county is a partner, the partnership may include an adjacent county and its eligible cities. To summarize: if the city is the applicant, the partnership cannot cross the county borders without creating a partnership with both counties.
- One of the eligible communities (city or county) in the partnership will be the applicant/potential grantee.
- Jurisdictions are permitted to submit or be a part of only one application.

Counties without CHIP Program-eligible cities will automatically receive points associated with partnership development. Such counties have the option to form a partnership with an adjacent county and its eligible cities, if feasible.

Any eligible jurisdiction that chooses not to be a direct participant for PY 2020, either as an applicant or a partner, may do so with no effect on the applicant's scoring or funding level by selecting one of the following options:

- **County Umbrella:** If an eligible city is not interested in being a partner for PY 2020 but is interested in CHIP Program funds being spent in their jurisdiction, the city can join its county's service area. The application for funding must contain a letter from the city's CEO electing for CHIP Program funds to be spent in its community under its county's jurisdiction to receive points associated with partnership development. When determining the applicant's ceiling amount, the county's amount must be based on amounts outlined for counties under *Maximum Award - Option 2* above or Partnership Applicants depending on whether the county has another partnering jurisdiction. There are no incentive funds available for this option. The county may participate as a single applicant, a partnership applicant, or a partner.
- **Jurisdiction Opt-Out:** If an eligible jurisdiction will not apply for CHIP Program funding in PY 2020 and is not interested in CHIP Program services within its jurisdiction, the application for funding must contain an opt-out letter from the jurisdiction's CEO to receive points associated with partnership development. The length of the opt-out period must be defined in the letter. Applicants that do not have other partnering options must refer to *Maximum Award - Option 2* above. This option is only available to jurisdictions that are not interested in participating in the CHIP Program and do not want funds spent in their jurisdiction.

Grant funds cannot be spent in a CHIP Program eligible jurisdiction that does not apply as a single applicant or is not part of an eligible partner's funded application via partner or under the county umbrella option.

The OCD expects CHIP Program services to be delivered within the partnership's jurisdictions. Partnership agreements between the applicant and partnering communities will be submitted in the application for funding. Sub-recipient agreements are prohibited. Prior to applying, the partnership must prepare a plan for expending the awarded funds throughout each jurisdiction. The plan must be submitted in the application for the OCD to evaluate.

Non-entitlement cities and counties that are part of a participating jurisdiction consortium and entitlement/non-participating jurisdictions may apply as single-community applicants and automatically receive points

associated with partnership development through application scoring or join an eligible partnership with the following restrictions:

- A non-entitlement/non-participating jurisdiction (see #1, “Eligible Jurisdictions” above) must be the applicant;
- When determining the partnership ceiling amount, the amount for non-entitlement jurisdictions that are part of a participating jurisdiction consortium and entitlement/non-participating jurisdictions (see #2 and #3, “Eligible Jurisdictions” above) must be based on the amounts outlined in “Eligible Jurisdictions”. If the partnership is formed with another single jurisdiction, the amount for non-entitlement/non-participating jurisdictions (see #1, “Eligible Jurisdictions”) must be based on amounts outlined under *Maximum Award - Option 2*. If the partnership is formed with multiple non-entitlement/non-participating jurisdictions (see #1, “Eligible Jurisdictions”), the amount for non-entitlement/non-participating jurisdictions may be based on amounts outlined under *Maximum Award - Option 2*; and
- No HOME funds can be spent in non-entitlement jurisdictions that are part of a participating jurisdiction consortium and no CDBG funds can be spent in the entitlement/non-participating jurisdictions.

Eligible Project Categories with Respective Activities:

All housing activities completed with CHIP Program grant funds must be single-family homes, as defined by HUD as one (1) to four (4) units. The activity descriptions listed below supersede the descriptions in OCD’s current Housing Handbook, Part I, and in the adopted Policy and Procedures Manual (PPM) selected for this application. **Grantees will adhere to OCD’s maximum per-unit limit of assistance for PY 2020 and will not institute local limits of assistance.**

Any projects funded with OHTF dollars must comply with the following requirements:

- Projects funded with OHTF dollars must benefit clientele at or below 50% of Area Median Income (AMI); and
- Section 504 of the Rehabilitation Act of 1973 prohibits providing federal financial assistance for disability-specific housing [see 24 C.F.R. Section 8.4(a)]. Therefore, housing projects funded with HOME or CDBG funds may not restrict occupancy to people with specific disabilities. Jurisdictions may, however, request OHTF funding for projects that provide rehabilitation and repair assistance to units designated for use by disability-specific clientele.

REHABILITATION ASSISTANCE:

OWNER REHABILITATION

Funding Source(s): CDBG and HOME

Eligible Activity Regulation: 24 CFR Part 570.202 or Part 92.205

OCD Maximum Per Unit Limit of Assistance: \$64,000 (including soft costs)

The purpose of the Owner Rehabilitation activity is to improve and protect the supply of sound, serviceable, and affordable owner-occupied housing stock. Through this activity, financial assistance is provided to homeowners with income levels at or below 80% of Area Median Income to correct substandard conditions so that the homes are safe, healthy, durable, energy efficient, and affordable. Owner Rehabilitation is intended to address problems throughout the home. In most circumstances, this means that the home’s mechanical systems (electrical, plumbing and, heating systems) and exterior and interior structural components (roof, walls, floors, and foundation) will be repaired or replaced to meet the required standards. Occasionally room additions, such as extra bedrooms, can be constructed to alleviate overcrowded conditions, or other rooms and modifications can be constructed to make the home more accessible for the elderly or persons with special needs. This activity can include replacing an owner-occupied dwelling that is unable to be rehabilitated, with an approved manufactured unit or a site-built unit located on the same property. When Owner Rehabilitation funds are used to replace a unit (commonly referred to as “reconstruction”), the funds can only pay for construction-related expenses and eligible related soft costs. In limited instances, this activity can

include refinancing of a small amount of existing debt on a home to be rehabilitated providing it is necessary to complete the project, as noted in 24 CFR Part 570.202 (b)(3). When refinancing is proposed, prior OCD approval is required. The OCD encourages grantees to consider conducting an environmental assessment for the housing programs to ensure that the highest level of clearance needed can be obtained. This will permit replacing substandard homes and other activities that, for environmental review purposes, are similar to “new construction” (such as room additions, tap-ins, etc.), to be conducted. Because rehabilitation must correct all substandard conditions that adversely affect the occupant’s health and safety and the dwelling’s structural integrity, the scope of work is generally comprehensive, and the cost is usually high. However, cost limitations often require the work to be prioritized so that the most substandard conditions (i.e., problems affecting occupant health and safety and structural integrity) are corrected before less important concerns are addressed. The OCD expects that all the substandard conditions be corrected before a project is considered complete. Homes that have numerous problems that cannot be corrected within the limit of financial assistance are inappropriate projects and must not be rehabilitated or considered for reconstruction unless sufficient funds from supplemental sources exist. The rehabilitation standard to which all projects must comply is in Part II of the OCD Housing Handbook known as the [State of Ohio Residential Rehabilitation Standard \(RRS\)](#).

RENTAL REHABILITATION

Funding Source(s): CDBG, HOME, and OHTF

Eligible Activity Regulation: 24 CFR Part 570.202 or Part 92.205

OCD Maximum Per Unit Limit of Assistance: \$64,000 (including required landlord contribution (local or State) and soft costs). **

The purpose of the Rental Rehabilitation activity is to improve and protect the affordable renter-occupied housing stock. Through this activity, financial assistance is provided to property owners to correct numerous substandard conditions so that the rental units are safe, healthy, durable, energy efficient, and affordable. Rental Rehabilitation is intended to address problems throughout the unit. In most circumstances, this means the unit’s mechanical systems (electrical, plumbing and heating systems) and exterior and interior structural components (roof, walls, floors, and foundation) will be repaired or replaced to meet the required standards. The rehabilitation standard to which all projects must comply is listed in Part II of the OCD Housing Handbook known as the RRS.

Because rehabilitation must correct all significant substandard conditions that adversely affect the occupant’s health and safety and the dwelling’s structural integrity, the scope of work is generally comprehensive, and the cost is usually high. However, cost limitations often require the work to be prioritized so that the substandard conditions (i.e., problems affecting occupant health and safety, and structural integrity) are corrected before less important concerns are addressed. The OCD expects that all the substandard conditions must be corrected before a project is considered complete. Only units occupied by tenant households with income levels at or below 80% of Area Median Income may receive rental rehabilitation assistance. For a duplex or a building with three to four units, only units occupied by tenant households with income levels at or below 80% of Area Median Income and common areas may receive rental rehabilitation assistance. Generally, common areas are the structural components or mechanical systems that are shared by all the tenants (such as a common hallway, roof or single HVAC system).

** Rental units that are in poor overall condition and/or that have serious problems that cannot be corrected within the limit of financial assistance are inappropriate projects and must not be rehabilitated unless sufficient funds from supplemental sources exist.

The rental units can be owned by private investors or by nonprofit organizations. To ensure that the tenant households with income levels at or below 80% of Area Median Income are the primary beneficiaries of the Rental Rehabilitation activity, two important requirements must be followed. First, for-profit property owners with income levels exceeding 80% of Area Median Income should contribute financially to the project. This requirement prevents a property owner from receiving a “windfall” of public investment in their business property. For for-profit property owners, grantees should require match funds, not to exceed 50% of the project hard costs, although the contribution may be less depending on the incentive level required for owners to participate. For nonprofit property owners and property owners with income levels at or below 80% of Area

Median Income, grantees may choose to require match funds, not to exceed 50% of the project hard costs. The OCD expects grantees to receive the contribution prior to issuing a 'Notice to Proceed'. Second, to help ensure that the property remains in the affordable rental housing stock inventory, the property owner must agree to rent the unit to tenant households, with income levels at or below 80% of Area Median Income, for the required affordability period. Also, the owner must agree to limit the rent so that it cannot exceed the appropriate Fair Market Rent for the same period of affordability.

REPAIR ASSISTANCE:

OWNER HOME REPAIR

Funding Sources: CDBG and OHTF

Eligible Activity Regulation: 24 CFR Part 570.202 (b, 2, 4, 6, 7 (iv), and 11)

OCD Maximum Per Unit Limit of Assistance: \$18,000 (including soft costs)

The purpose of the Owner Home Repair activity is to help preserve the affordable housing stock by providing owner-occupied households with income levels at or below 80% of Area Median Income with limited financial assistance to correct significant problems in the home. Unlike Owner Rehabilitation, which addresses the entire home, the Owner Home Repair activity can address one or more specific problems that adversely affect occupant health and safety and/or structural integrity.

If a home receives assistance from the Owner Home Repair activity and the Owner Rehabilitation activity, the total amount of assistance is subject to the same terms and assistance limit as if it had received Owner Rehabilitation assistance only and cannot be considered as an Owner Home Repair project.

The types of work that are generally considered eligible for the Owner Home Repair activity include:

Structural System Repairs: This type of work involves repairs to eliminate hazardous conditions or serious threats to the integrity of a structural system. Examples of common structural system repairs include, patching or replacing leaking roofs, rebuilding collapsed foundations, and replacing weakened or deteriorated framing components. It may also include the replacing individual non-functioning or damaged windows or entry doors.

Mechanical System Repairs: This type of work involves repairs to eliminate hazardous conditions with the electrical, plumbing, or heating systems. Examples of common mechanical system repairs include replacing unsafe or overloaded electrical panels and circuits, repairing or replacing leaking water supply and/or sanitary drain plumbing lines, and repairing or replacing unsafe or inoperable heating equipment.

Plumbing System Tap-ins: This type of work involves connecting a home's plumbing system to a public water supply and/or public sewage system and paying the associated tap-in fees.

Wells and Septic Systems: This type of work involves repairing or replacing a home's private well and/or septic system that is malfunctioning or has been cited by local or state health departments or the Environmental Protection Agency as outdated and in need of improvement.

Weatherization: This type of work involves utilizing cost-effective measures to improve energy efficiency such as insulating un-insulated attics and sidewalls, and related measures to control air movement, such as sealing holes and bypasses and installing exhaust and ventilation fans.

Accessibility: This type of work involves utilizing measures designed to improve access and mobility for occupants who are physically disabled or infirm. Generally, these measures include exterior ramps, grab bars and specialized bathroom fixtures. In some cases, more extensive work is required to remove architectural barriers, widen doorways, lower cabinets, or remodel bathrooms to meet household needs. The work completed to improve accessibility must meet or exceed the design and installation standards outlined in the Uniform Federal Accessibility Standards (UFAS).

Lead Based Paint (LBP) Hazard Reduction: This type of work involves measures to eliminate known LBP hazards in homes occupied by an Elevated Blood Lead Level (EBLL) child, or in households with children under six years of age. The work must be performed in compliance with all applicable state and federal regulations and guidelines, particularly those outlined in the 'HUD Guideline for the Evaluation and Control of LBP Hazards in the Home'.

RENTAL HOME REPAIR

Funding Source: CDBG and OHTF

Eligible Activity Regulation: 24 CFR Part 570.202 (a,1); (b, 2, 4, 6, 11); and (e)

OCD Limit of Assistance: \$18,000 per housing unit (including required landlord contribution and soft costs)

The purpose of the Rental Home Repair activity is to improve and protect the affordable renter-occupied housing stock. Through this activity, financial assistance to the property owners is limited to correcting one or more specific problems that adversely affect occupant health and safety and/or the unit's structural integrity. The rental units can be owned by private investors or by nonprofit organizations. To ensure that the tenant households with income levels at or below 80% of Area Median Income are the primary beneficiaries of the Rental Home Repair activity, two important requirements must be followed. First, for-profit property owners with income levels exceeding 80% of Area Median Income **must** contribute financially to the project. This requirement also helps to prevent a property owner from receiving a "windfall" of public investment in their business property. For-profit landlord contributions **must** be 50% of the hard costs of the project. For nonprofit property owners and property owners with income levels at or below 80% of Area Median Income, grantees may choose to require match funds, not to exceed 50% of the project hard costs. The OCD expects grantees to receive the contribution prior to issuing a 'Notice to Proceed'. Second, to help ensure that the property remains in the low-income rental housing stock inventory, the property owner must agree to rent the unit to tenant households with income levels at or below 80% of Area Median Income for a period of two years. Also, the owner must agree to limit the rent so that it cannot exceed the appropriate Fair Market Rent for the loan's required two-year period. The unit's affordability must be enforced through a recorded loan document. Rental Home Repair assistance shall be provided to the property owner in the form of a 0% interest, 100% deferred/declining (50% annually), forgivable loan, with a two-year term. The RRS is the standard to which the Rental Home Repair work must comply. However, only the work completed under the Rental Home Repair activity must meet the RRS, not the entire home (as with the Rental Rehabilitation activity).

If a home receives assistance from the Rental Home Repair activity and the Rental Rehabilitation activity, the total amount of assistance is subject to the same terms and limit of assistance as if it had received Rental Rehabilitation assistance only and cannot be considered as a Rental Home Repair project.

Because the Rental Home Repair activity addresses one or more serious health and safety issues, the scope of work is less extensive and the costs are generally lower than the Rehabilitation activities. The scope of work must be limited to correcting only the problem(s) that qualify the home as a Rental Home Repair project, and items that are directly related to correcting the initial problem. For example, if a furnace is to be replaced, the scope of work could also include limited electrical and fuel system work to ensure that the electrical circuit and fuel line servicing the furnace are safe. Or, if a plumbing system is tapped into a public water supply, the scope of work could also include interior plumbing work to ensure that the water supply lines are adequate. However, grantees must understand that the Rental Home Repair activity is not a mini rehabilitation program or a program intended to provide home maintenance services. Homes that have numerous problems requiring extensive repairs should be considered for complete rehabilitation. The Rental Home Repair activity can address emergencies if the condition meets the U.S. Department of Housing and Urban Development's definition of an emergency.

The types of work that are generally considered eligible for the Rental Home Repair activity include:

Structural System Repairs: This type of work involves repairs to eliminate hazardous conditions or serious threats to a structural system's integrity. Examples of common structural system repairs include, patching or replacing leaking roofs, rebuilding collapsed foundations, and replacing weakened or deteriorated framing components. It may also include replacing individual non-functioning or damaged windows or entry doors.

Mechanical System Repairs: This type of work involves repairs to eliminate hazardous conditions with the electrical, plumbing or heating systems. Examples of common mechanical system repairs include replacing unsafe or overloaded electrical panels and circuits, repairing or replacing leaking water supply and/or sanitary drain plumbing lines, and repairing or replacing unsafe or inoperable heating equipment.

Plumbing System Tap-ins: This type of work involves connecting a home's plumbing system to a public water supply and/or public sewage system and paying associated tap-in fees.

Wells and Septic Systems: This type of work involves repairing or replacing a home's private well and/or septic system that is malfunctioning or has been cited by local or state health departments or the Environmental Protection Agency as outdated and in need of improvement.

Weatherization: This type of work involves utilizing cost-effective measures to improve energy efficiency such as insulating un-insulated attics and sidewalls, and related measures to control air movement, such as sealing holes and bypasses and installing exhaust and ventilation fans.

Accessibility: This type of work involves utilizing measures designed to improve access and mobility for occupants who are physically disabled or infirm. Generally, these measures include exterior ramps, grab bars and specialized bathroom fixtures. In some cases, more extensive work is required to remove architectural barriers, widen doorways, lower cabinets or remodel bathrooms to meet household needs. The work completed to improve accessibility must meet or exceed the design and installation standards outlined in the Uniform Federal Accessibility Standards (UFAS).

Lead-Based Paint (LBP) Hazard Reduction: This type of work involves measures to eliminate known LBP hazards in homes occupied by an Elevated Blood Lead Level (EBLL) child, or in households with children under 6 years of age. The work must be performed in compliance with all applicable state and federal regulations and guidelines, particularly those outlined in the 'HUD Guideline for the Evaluation and Control of LBP Hazards in the Home'.

HOMEOWNERSHIP ASSISTANCE:

HOMEOWNERSHIP

(DOWN PAYMENT ASSISTANCE/REHABILITATION OR DOWN PAYMENT ASSISTANCE ONLY)

Funding Source(s): HOME

Eligible Activity Regulation: 24 CFR Part 570.201 (n) and Part 92.205

OCD Maximum Per Unit Limit: \$65,000 (including soft costs)

The Homeownership activity is, in effect, a combination of Down Payment Assistance and the Owner Rehabilitation activity. Accordingly, the purpose of the Homeownership activity is to increase the number of owner-occupied households with income levels at or below 80% of Area Median Income, and to improve and protect that housing stock. The types of houses that are eligible for purchase include single-family homes, town houses, condominiums, and manufactured/modular homes. Down Payment Assistance, by itself, may be provided if the home does not require rehabilitation. This means that the home must either be a new or existing home that already meets applicable standards, or a home that the improvements have been completed by other programs or through the financing arrangement.

Through this activity, financial assistance is provided to households to purchase homes. The assistance may include providing a subsidy to lower the interest rate for the loan and/or principal amount, providing down payments, and paying reasonable closing costs. All loans from financial institutions must, at a minimum, meet the requirements outlined in the OCD's Underwriting Process. Grantees must follow all Uniform Relocation Assistance and Real Property Acquisition policies and procedures to ensure that the purchases are considered voluntary.

The standard to which the acquired homes must comply is the State of Ohio Residential Rehabilitation Standards (RRS), and any locally adopted codes. For homes that do not meet this standard at the time of

purchase, the Homeownership activity also provides financial assistance to correct problems with those homes. To ensure that homes are safe, all defects that adversely affect the occupants' health and safety must be corrected immediately following the purchase closing, but prior to the buyer occupying the home. To ensure that the home meets the RRS within a reasonable timeframe, all rehabilitation work must be completed within six (6) months of the purchase closing.

In addition, the Homeownership activity must also include homebuyer counseling to help ensure that participants are well informed about private financing and the real estate purchasing process. The required homebuyer counseling budget must not exceed \$500 per household and the counseling content must comply with the current HOME Final Rule. Prior to the purchase, the homebuyer education program must cover the following areas:

- homebuyer decision process;
- budget and credit management;
- mortgage loans and closings;
- fair housing issues; and
- home maintenance and repair practices.

Successful Homeownership activity implementation requires strong working relationships with each party involved in the process. Grantees should develop good relationships with realtors and bankers to ensure that those parties understand how the program functions. Realtors and bankers must understand the client group and the homes and finance packages best suited for their needs. Clients also must clearly understand the program and their obligations, such as attending education sessions, obtaining financing, selecting a home and financially contributing to the transaction. A primary success factor is long-term affordability. Not only must the monthly mortgage payments be affordable, but the other housing costs, such as taxes and insurance, must also be affordable. The OCD defines affordable as payments for principal, interest, taxes and insurance (PITI) that do not exceed 30% of gross monthly household income.

NEW CONSTRUCTION - HABITAT FOR HUMANITY

Funding Source(s): HOME

Eligible Activity Regulation: Part 24 CFR 92.205

OCD Maximum Per Unit Limit of Assistance: \$30,000 per unit (including soft costs not exceeding 10% of CHIP hard costs)

The purpose of the New Construction - Habitat for Humanity activity is to create new permanent housing to expand the affordable owner-occupied housing stock. Generally, successful implementation of this activity requires extensive planning and coordination with the Habitat for Humanity affiliate. A subsidy is provided to the Habitat for Humanity affiliate for a new home construction to be purchased by a partner family with a household income that does not exceed 80% of Area Median Income. When providing a subsidy to Habitat for Humanity projects (whether as a development subsidy to the project, or as an affordability subsidy to the buyer), all grantees shall abide by the resale affordability provisions as outlined in 24 CFR 92.254. Principal, interest, taxes and insurance, after program assistance, shall not exceed 30% of the household's total monthly gross income, as calculated for determining income eligibility. Grantees shall provide homebuyer counseling with a cost not to exceed \$500 per household and the counseling content must comply with the current HOME Final Rule.

Homes constructed under this activity must comply with all applicable building/construction codes. If no local codes exist, the unit must comply with the RRS.

TENANT-BASED RENTAL ASSISTANCE

Funding Source(s): HOME

Eligible Activity Regulation: 24 CFR Part 92.205 and 92.209

OCD Limit of Assistance: payment based on housing payment and household income

The purpose of the Tenant-Based Rental Assistance (TBRA) activity is to provide affordable monthly rental payments for tenant households with income levels at or below 60% of Area Median Income. To ensure that the rental units are decent, safe and sanitary, TBRA-subsidized units must meet HUD's Housing Quality Standards (HQS) (see 24 C.F.R. 982.401). Through this activity, grantees provide limited financial assistance to property owners to subsidize their income-eligible tenant's monthly rental payments. Generally, the subsidy payment is an amount equal to the difference between the established Rent Standard (based on local market conditions or the Fair Market Rent (FMR) for the unit size) and 30% of the tenant household's adjusted monthly income. Payments can also include security and utility deposits. Utility deposits can be provided only in conjunction with rental subsidy and/or security deposit assistance. Grantees generally contract with their local Housing Authority to implement TBRA Programs, although it is not required.

TBRA programs are generally modeled on the HUD Section 8 Voucher Program. The Voucher design places a cap on the subsidy but does not limit the rental amount that property owners can charge. Under this design, the rental assistance subsidy is determined as the difference between the rent standard for the rental unit's size (number of bedrooms) and 30% of the tenant's adjusted monthly income. Tenants must pay the difference between the rent and the subsidy. Clients may choose units that rent for more than the rent standard or FMR; however, they must pay the difference even if that amount is more than 30% of their adjusted monthly income. [Note: the Certificate design, that places a cap on the rent and fixes the tenants rent payment at 30% of the household's adjusted income (or 10% of gross income), is no longer a program design option for TBRA programs operated by Housing Authorities].

Although TBRA programs may be modeled on the HUD Section 8 Voucher Program, grantees must ensure that their TBRA programs meet the requirements of 24 CFR Part 92.209 regarding tenant selection, portability, terms of assistance, rent reasonableness, tenant protection, maximum subsidy, housing quality standards, security deposits and program operation. For CHIP grantees, households must have income levels at or below 60% of the Area Medium Income. Grantees must also establish a minimum tenant contribution towards the rent and ensure that leases meet minimum requirements regarding their length and terms (see 24 CFR Part 92.253 (a) and (b)). In general, leases cannot be for less than 12 months unless mutually agreed by the tenant and the property owner and cannot exceed 24 months without being renewed. Families or individuals provided with HOME TBRA must be selected based on one of the following:

- The Section 8 waiting list of a Public Housing Authority (PHA) operating within the jurisdiction of the CHIP grantee based on preferences established by the PHA.
- A waiting list established by the participating jurisdiction based on the established federal preferences and/or local preferences.
- Eligible families that currently reside in units that are designated for rehabilitation under the HOME program without requiring them to be placed on the PHA waiting list.

ADMINISTRATION COSTS:

Funding Source(s): CDBG and HOME

Eligible Activity Regulation: 24 CFR Part 570.206 or Part 92.207

A maximum of 12% of the total grant request may be budgeted for eligible general administrative activities. The HOME Program administrative budget amount is limited to 10% of the total HOME Program funds requested. Fair housing activities may be included in the CDBG administrative funds request. Eligible administrative costs are identified at 24 CFR 570.206 for CDBG Program funds and 24 CFR 92.207 for HOME Program funds.

All soft costs related to work completed on a specific unit meeting a national objective or income eligibility must be paid for in one of two ways:

- (a) these costs may be charged to the unit; or
- (b) these costs may be charged to administration.

All soft costs associated with projects that do not meet a national objective or income eligibility must be charged to administration. Eligible soft costs for the CDBG Program are defined at 24 CFR Part 570.202(b) (9) and for the HOME Program at 24 CFR 92.207(b).

FAIR HOUSING

Funding Source(s): CDBG

Eligible Activity Regulation: 24 CFR Part 570.206

Grantees must establish a Fair Housing training and outreach program specific to CHIP Program activities and participants. Fair housing information (i.e., brochures) must be distributed to each applicant and/or recipient of CHIP Program assistance. Homebuyer education programs associated with Homeownership Assistance activities must contain a fair housing component that includes information regarding potential discriminatory actions related to lending, insurance, and real estate practices, including abusive or unfair lending practices. Owners who participate in rental rehabilitation/repair projects must receive fair housing and tenant landlord training and/or information. Grantees are required to establish a system for intake and processing of fair housing complaints. Grantees must maintain records to document implementing the fair housing program.

Application Timing:

Submission: June 24, 2020

Grant Award: September 1, 2020

Program Income: Any program income resulting from expending HOME and CDBG funds may be retained by the grantee but must be maintained in separate accounts. However, all CDBG housing program income must be used for an eligible CDBG housing activity, and all HOME Program income must be used for an eligible HOME Program activity. Eligible program income expenditures must follow the grantees OCD-approved CHIP Program Policy and Procedures Manual and executed Housing Revolving Loan Fund Administrative Agreement or receive the OCD's prior written approval. Use of program income must comply with the Policy Notice 15-04, Program Income Policy, at <http://bit.ly/OCD1504> and applicable federal and state laws and regulations. In accordance with 24 CFR 92.504(c)(1)(viii), committed housing program income must be disbursed prior to the grantee requesting funds from the State. Committed is defined as having an executed contract or funds officially obligated in a program. Also, the OCD requires that all uncommitted Housing Program Income balances at the time of application, HOME or CDBG, be committed to projects in the CHIP Program application or designated in the implementation plan to be expended during the grant period.

Program Grant Period: PY 2020 CHIP Program grantees must complete their programs according to the following deadlines:

- 1) all activities (except audit and balance of administration) must be completed by the end of the 26th month, following the grant agreement start date;
- 2) all drawdown requests must be submitted to the OCD by the end of the 27th month; and
- 3) all funds must be committed and expended in accordance with the timeline established in the program milestones, and the final performance report must be submitted by the end of the 28th month. Grant audit(s) must be conducted in accordance with, 2 CFR 200 and Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

Program Beneficiaries: One hundred percent (100%) of all funds must be budgeted for activities benefiting low- or moderate-income households.

Fair Housing Requirements: Communities receiving CHIP Program funds must meet Fair Housing requirements as described in the Local Government Certifications to the State (see the OCD Program Policy section of this document).

Tenant-Based Rental Assistance: Consistent with the state's Consolidated Plan goal of providing a continuum of care in housing assistance, the state will offer Tenant-Based Rental Assistance opportunities. The state will allow communities to establish a local Tenant-Based Rental Assistance Program through the state's decentralized CHIP Program. The state will only fund applicants if:

- 1) The need for Tenant-Based Rental Assistance has been identified as a need through the local planning process, and/or is part of the jurisdiction's local housing strategy, and describes the local market conditions that support the need for this type of assistance; and

- 2) Families or individuals provided with HOME Tenant-Based Rental Assistance are below 60% of the area median income and selected based on either a or b, or c as follows:
 - a. The Section 8 waiting list of a Public Housing Authority (PHA) operating within the applicant's jurisdiction based on preferences established by the PHA;
 - b. A waiting list established by the participating jurisdiction based on the established federal Preferences and/or local preferences; or
 - c. Eligible families that currently reside in units designated for rehabilitation under the HOME Program without requiring them to be placed on the PHA waiting list.

Resale/Recapture Requirements: Program Specific Resale and Recapture Requirements may be viewed in the Office Policies Section of this plan. Communities receiving CHIP Program grant awards shall abide by Policy Notice 15-03, Finance Mechanisms, for Office of Community Development Program-Funded Projects. This policy can be viewed at <http://bit.ly/OCD1503>.

Rating Criteria: All applications are reviewed, rated, and scored based on the criteria outlined below. Applications may achieve a score up to 100 points. The process is competitive and designed to rank, in order, the communities to be funded through the CHIP Program.

Distress (10 points maximum)

An assessment of the applicant's level of distress based upon an average of the following trends in the current census data related to low- and moderate-income household needs across the state using:

- (1) an average of the participating communities' percentage of low- and moderate-income populations;
- (2) the percentage of households paying more than 35% of income for housing;
- (3) age of housing stock; and
- (4) unemployment rates.

Alternatively, an applicant may request to use data from a jurisdiction-wide LMI survey the applicant conducted, and the OCD approved in lieu of the Census Data.

Capacity and Performance (60 points maximum)

Capacity will include the proposed administrative plan's adequacy, consistency with application requirements, the capacity for implementing the proposed activities, demonstrated readiness to proceed with the proposed activities, and the adequate filling of the required roles to successfully administer a grant.

CHIP Program-eligible counties and cities forming an eligible partnership shall receive points associated with partnership development. Counties containing no CHIP Program-eligible cities and such jurisdictions not eligible to form a partnership (see *Eligible Jurisdictions 2* and 3) will automatically receive points associated for partnership development.

Performance scoring will be based upon the applicant's performance. Non-applicant partners' performance will not affect the overall application scoring, but based on each jurisdiction's performance, the portion of the grant total attributable to any partner may be reduced by up to 50% of the eligible amount available to that jurisdiction if serious performance issues exist. It will be incumbent on all partner jurisdictions to fully disclose negative performance issues.

Performance will include prior and current performance in administering and complying with grant agreement(s), program regulations and policies, resolving monitoring and/or audit findings, and progress in completing activities. **Any OCD-funded program may be evaluated** while determining the applicant's performance.

Impact (30 points maximum)

Impact will be based on the applicant's marketing and accessibility of the program to the target citizens, and the consistency with federal and state program requirements and the application instructions in the community's application. Impact will also take into consideration cost effectiveness, and the applicant's ability

to demonstrate collaboration with other local resources and will include an assessment of the applicant’s planning process for its service area.

Program Amendments: Because grant awards are based on the projects proposed in the application, grantees receiving CHIP Program funds are generally discouraged from changing their approved projects. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments, or grant deadlines, must submit a Grant Amendment Request in OCEAN.

Please note the following CHIP Program specific amendment conditions:

- Grantees increasing or decreasing a previously approved **project category** by more than \$5,000 or 10%, whichever is greater, must request an amendment to an executed grant agreement. These thresholds must be applied to both the **project category** from which the funds are to be decreased and the **project category** to which the funds will be increased. Increases or decreases less than this threshold will be reconciled during the closeout process. **Grantees are prohibited from moving funds into an activity that is not included on the Attachment A: Scope of Work and Budget of that funding source without an amendment.** The administration amount allocated in the original grant agreement **cannot** be exceeded. Activity dollars cannot be moved to administration without an amendment.
- At any time during the grant period, the first approved amendment to adjust funds between eligible project categories or reduce total grant amount, including administration dollars, will be considered with no penalty to subsequent applications.
- The OCD will issue a grant deadline amendment **with penalty** if the milestones associated with the work completion and/or final drawdown dates are not met.
- After the first no-penalty amendment has been issued and a subsequent amendment is requested, the following Grant Deadline principles will apply to the TBRA activity only:

Chart 1: Unexpended Funds	
Percent of TBRA Activity Budget	Penalty on Future Funding Requests
10% or less	None
> 10% - 20%	Minor
> 20%	Major

Chart 2: Length of Time	
Number of Days Approved to Extend Grant Deadline	Penalty on Future Funding Requests
90 or less	None
91 - 180	Minor
> 180	Major

Both charts above will be used to determine the need for an amendment at the time of the request. A penalty will be assessed based on the most stringent of the two (2) charts above. For example, a grantee that has 8% of their unexpended TBRA budget (Chart 1) that will require 180 days to complete the activity (Chart 2) will incur a Minor penalty. The principle in Chart 1 in this scenario induces no penalty; however, the principle in Chart 2 induces a minor penalty. The penalty induced by Chart 2 is the most stringent. During the extended grant period, the CDBG and HOME grants will be left open with conditions on which activities will remain active to continue administration:

- HOME – TBRA
- CDBG – Administration and Fair Housing

Any request for an amendment not outlined above will be considered on a case-by-case basis.

Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy. After the first no-penalty amendment or unless otherwise specified, the OCD will consider amendments in application scoring during future funding rounds.

PY 2020 CHIP Program Eligible Communities: The jurisdictions in Table 3 are eligible for PY 2020 CHIP Program funding if they have an approved CHIP Policy and Procedures Manual. The following communities are eligible for PY 2020 CHIP Program Funding if they did not receive a PY 2019 CHIP Program award as an applicant or partner unless awarded a one-year grant.

Table 3: PY 2020 CHIP Program Eligibility

PY 2020 CHIP Program CDBG and OHTF Eligible Jurisdictions

Trumbull County	Hubbard	Cortland
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PY 2020 CHIP Program HOME Eligible Communities

Bowling Green	Kent	Sandusky
Clermont County	Lancaster	Steubenville
Elyria	Marietta	Warren County
Fairborn	Newark	

PY 2020 CHIP Program CDBG, OHTF and HOME Eligible Counties

Adams	Coshocton	Hancock	Logan	Muskingum	Scioto
Allen	Crawford	Hardin	Lorain	Noble	Seneca
Ashland	Darke	Harrison	Lucas	Ottawa	Shelby
Ashtabula	Defiance	Henry	Madison	Paulding	Tuscarawas
Athens	Delaware	Highland	Mahoning	Perry	Union
Auglaize	Erie	Hocking	Marion	Pickaway	Van Wert
Belmont	Fairfield	Holmes	Medina	Pike	Vinton
Brown	Fayette	Huron	Meigs	Portage	Washington
Carroll	Fulton	Jackson	Mercer	Preble	Wayne
Champaign	Gallia	Jefferson	Miami	Putnam	Williams
Clark	Geauga	Knox	Monroe	Richland	Wood
Clinton	Greene	Lawrence	Morgan	Ross	Wyandot
Columbiana	Guernsey	Licking	Morrow	Sandusky	

PY 2020 CHIP Program CDBG, OHTF and HOME Eligible Cities with Population > 15,000 and LMI ≥ 25%

Ashland	Defiance	Marysville	North Ridgeville	Sidney	Wooster
Ashtabula	Delaware	Medina	Norwalk	Streetsboro	Xenia
Athens	Findlay	Mount Vernon	Oregon	Tiffin	Zanesville
Brunswick	Fremont	New Philadelphia	Piqua	Troy	
Chillicothe	Marion	Niles	Portsmouth	Wadsworth	

PY 2020 CHIP Program CDBG, OHTF and HOME Eligible Cities Population < 15,000 and LMI ≥ 25%

Amherst	Clyde	Girard	Maumee	Rittman	Urbana
Bellefontaine	Columbiana	Greenville	Napoleon	Shelby	Washington C.H.
Bellevue	Conneaut	Heath	Nelsonville	Rossford	Van Wert
Belpre	Coshocton	Hillsboro	New Carlisle	Salem	Vermilion
Bryan	Delphos	Huron	Northwood	Sheffield Lake	Wapakoneta
Bucyrus	Dover	Ironton	Oberlin	St. Marys	Wauseon
Cambridge	East Liverpool	Jackson	Ontario	Struthers	Wellston
Campbell	Eaton	Kenton	Orrville	Tipp City	Willard
Celina	Fostoria	Logan	Pataskala	Toronto	Wilmington
Chardon	Galion	London	Port Clinton	Uhrichsville	
Circleville	Geneva	Martins Ferry	Ravenna	Upper Sandusky	

Housing Assistance Grant Program

Goal: To promote affordable housing opportunities and improve housing conditions for low-income families and individuals.

Total Funds Available: SFY 2021 Ohio Housing Trust Funds (amount to be determined).

Eligible Applicants: Private, nonprofit organizations incorporated with Ohio's Secretary of State and granted 501(c)(3) status by the Internal Revenue Service.

Maximum Award Amounts:

Agencies currently participating in the Housing Assistance Grant Program (HAGP) are eligible to apply for an amount equal to their last HAGP award, unless the agency can demonstrate an increased need for funding based on program expansion, increased utilization of the program, etc. Applicants for programs that have not previously been funded under this program should contact the Office of Community Development (OCD) for guidance in determining an appropriate request amount. The OCD reserves the right to make awards at levels less than requested. Awards will be based on available funding, service area, population served, community need, and cost reasonableness as detailed in the rating criteria.

Recommended Request Amounts:

Funding requests must be cost-effective and reasonable based on community need, historic funding levels from the OCD, cost per household served, cost per outcome, etc. The OCD will provide guidance on recommended request amounts in the PY 2020 Housing Assistance Grant Program application. The OCD reserves the right to make awards at levels less than requested.

Eligible Activities:

- Essential home repair/accessibility modifications that, if not corrected, could pose a threat to the occupants' health or safety. Assistance is limited to \$7,500 per unit. Household income must be at or below 50% Area Median Income (AMI).
- Down Payment Assistance – Investment of up to \$3,000 per unit for down payment assistance and associated out-of-pocket expense to persons with incomes at or below 65% AMI.
- Homebuyer Education – Pre- and post-purchase counseling must be tied to Down Payment Assistance activity. Income targeting to households at or below 65% AMI.

Equal Access:

Supportive housing projects must ensure they comply with the Equal Access to Housing Final Rule. Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are a family and must be served together as such. Projects may NOT limit housing and services to certain types of family compositions (e.g. women with children or married couples with children).

Matching Requirements: Each \$2 in HAGP funds must be matched with \$1 in cash and/or in-kind resources. Grants or loans from Development cannot be used as a match.

Threshold Requirements:

- Proposals must include documentation verifying sufficient matching funds commitment to meet the match requirements.
- Proposals must be for eligible activities consistent with HAGP definitions and guidelines.

- Applications must be complete and include essential information and exhibits.

Rating Criteria: The OCD will rate applications based on the following criteria.

- 1) **Program Impact (10 points):** Projects will be evaluated based on the extent to which the proposal has a direct relationship to eligible categories in HAGP;
- 2) **Need (10 points):** Extent to which the project fills a gap in available housing activities that cannot be provided through other means and, for Essential Home Repair/Accessibility Modifications projects, evidence that CDBG funds are not available;
- 3) **Income targeting (10 points):** Extent to which the project serves low-income persons with household income at or below 50% AMI for Essential Home Repair/Accessibility Modifications and/or 65% AMI (with a preference of 50% AMI) for Down Payment Assistance/Homebuyer Counseling;
- 4) **Organization History (10 points):** Extent to which the applicant demonstrates the ability to successfully implement the proposed activities;
- 5) **Staff Background/Experience (10 points):** Projects will be evaluated based on the degree to which resumes or position descriptions are provided for key staff involved in the project and demonstrate sufficient background and experience to successfully implement the project;
- 6) **Program Feasibility (15 points):** The extent to which the project is reasonable and cost-effective based on the request amount, cost per housing unit, etc.;
- 7) **Program Coordination (10 points):** Projects will be evaluated based on the extent to which documentation demonstrating coordination and support for the project or activity is provided by organizations involved in the project;
- 8) **Project Design/Outcomes (20 points):** The extent to which projects are well-designed, clearly presented, and are likely to produce or retain housing stock and accomplish the stated objectives and proposed outcomes; and
- 9) **Budget/Reasonableness (5 points):** The extent to which budget figures are accurate, consistent, and reasonable.

Program Period: The program year will begin March 1, 2021, provided sufficient OHTF dollars are available. Grantees must complete their program according to the following deadlines for two-year grants:

- (1) All activities must be completed by the end of the 24th month, as determined by the work completion date identified in the grant agreement; and
- (2) All drawdown requests must be submitted to the OCD within one month of the work completion deadline; and
- (3) All funds must be disbursed and expended, and a final performance report must be submitted to the OCD within two months of the work completion deadline.

Reduction of Grant Request: The OCD reserves the right to award competitive grants at amounts lower than requested in the application.

Application Submission: The HAGP application submission deadline is 11:59 p.m. on October 7, 2020.

Grant Award: Approximately 12 weeks after submission and following Controlling Board Approval.

Housing Development Assistance Program

Goal: The goal of the OHFA Housing Development Assistance Program (HDAP) is to support the capacity of housing development organizations and provide financing for eligible housing developments to expand the decent, safe, affordable housing supply for very low-to-moderate income persons and households in the state of Ohio. Resources will be used to preserve at-risk affordable housing, create new affordable rental housing, and developing affordable homeownership opportunities.

Total Funds: The HDAP will use the following three funding sources to provide financial assistance to eligible developments. Funds will be awarded in the form of a loan or grant.

HOME Investment Partnerships Program (HOME): Approximately \$7.9 million. Federal regulations relating to environmental review, federal wage rates, federal accessibility, federal acquisition and relocation laws (URA and Section 104(d)), long-term affordability, etc. apply.

Ohio Housing Trust Fund (OHTF): Amount to be determined. The OHTF dollars, pending Controlling Board approval, will be awarded to provide gap financing to developments predominantly serving low-income households with incomes at or below 50% of the area median income. The OHTF gives preference to those developments that benefit households with incomes at or below 35% of the area median income for the county where the development is located, as established by HUD.

OHTF resources may also be used for homeownership developments and developing or rehabilitating housing serving people with mental health issues and developmental disabilities. All households served will have incomes at or below 80% of the area median income. At least 50% of all OHTF funds are to be allocated to rural areas and small cities that would not be eligible to participate as a participating jurisdiction under the HOME Investment Partnerships Program. State prevailing wages and associated laws are applicable.

National Housing Trust Fund (NHTF): Approximately \$7 million. The NHTF dollars will be awarded to provide gap financing to developments serving extremely low-income households with incomes at or below 30% of the area median income. NHTF gives preference to those developments in accordance with an annual Allocation Plan and includes priority for geographic diversity, ability to obligate and undertake activities in a timely manner, affordability and project-based rental assistance, affordability period duration, merits in meeting state housing need, and leveraging non-federal funding sources

The resources described above will be allocated through the HDAP administered by OHFA, which includes the Bond Gap Financing (BGF) program, the Housing Credit Gap Financing (HCGF) program, and the Housing Development Gap Financing (HDGF) program.

Funding Requirements for All HDAP Awards:

- 1) **Reporting and Record Keeping:** The applicant will be responsible for compliance with applicable implementation, reporting and record keeping requirements associated with HOME, NHTF, 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.

Best efforts will be made to fund scattered site developments (10 or more non-contiguous parcels), if any, with OHTF dollars.

HOME:

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

OHFA will allocate \$1,000 per development funded with HOME funds for publishing the environmental review Public Notice.

OHTF:

OHFA has created environmental review standards for projects awarded OHTF funds. The standards are available on OHFA's website at <https://ohiohome.org/ppd/resources.aspx>.

NHTF:

Environmental reviews are conducted in accordance with the NHTF Environmental Provisions for new construction and rehabilitation under the Property Standards at 24 CFR. 93.301(f)(1) and (2).

- 3) **Determination and Requirements for Assisted Units:** The amount of HOME funds will be used to determine the number of units that are HOME-assisted and must comply with HUD's High- and Low-HOME rent requirements.

The total amount of HOME and HOME-match dollars includes any and all HDAP funding, regardless of the source, plus local dollars. The number of units that receive HOME assistance will be rounded up to determine the number of assisted units that must comply with HOME rent restrictions. OHFA may have to increase the number of HOME-assisted units if:

- (1) the total subsidy per assisted unit exceeds the Section 221(d)(3) – 234 limits, and/or
- (2) the total subsidy per assisted unit exceeds the total development cost per unit.

If there are five or more units assisted by HOME dollars (state and local) in the development, 20% of the assisted units will be restricted to the Low HOME rents. Assisted units will also be distributed evenly among various unit sizes in the development. OHFA reserves the right to require that units assisted through the HDAP be distributed evenly between newly constructed units and rehabilitated units. The applicant can elect for those units to be fixed units or floating units. For homeownership developments, all units will be considered assisted.

- 4) **Rehabilitation Standards:** Developments that involve rehabilitating structures must adhere to the OCD Residential Rehabilitation Standards (RRS). Refer to the OCD's RRS Handbook, or other standards agreed upon by OHFA and the OCD.
- 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. NHTF funds may only be used for public housing in limited

circumstances. 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 Part 92.257.

OHFA reserves the right to evaluate developments, including those that have previously received an award of 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 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. For this purpose, 'affordable' is defined as housing which, because of one of the funding sources, the population being served, or the area in which the project is located, is required to maintain below market-rate rents on any of its units. Applicants requesting funds for this purpose must be prepared to present compelling reasons why HDAP funds should be used to rehabilitate an existing affordable development.

- 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), HDGF Guidelines, 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:**

OHTF/HOME:

- 2% interest will be charged unless otherwise agreed to by OHFA;
- Loan 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 upon 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 upon 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
- For HOME-funded developments, loans will be made to the development's ownership entity. OHTF loans will be made to the HDAP recipient as the project's general partner, managing member or equivalent that may then lend the funds to the project at a commercially reasonable rate. OHFA reserves the right to designate which general partner/managing member/owner, if more than one (1), will be the recipient.

NHTF:

- Awarded NHTF funds are structured as a deferred loan with payment due on sale;
- The mandatory rental affordability period and the loan term are no less than 30 years;
- The interest rate is 0%; and
- Additional requirements are set forth in HUD's Interim Rule at 24 CFR Parts 91 and 93 and Interim Rule FR-5246-I-03.

15) **Grants:**

OHTF/HOME:

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; and
- The recipient does not loan the funds to the development but treats it as a grant or capital contribution.

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

For housing tax credit (HTC) 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 (HOME, NHTF, or OHTF) when considering how the recipient passes the award on to the development.

16) **Transitional Housing:**

Transitional housing is eligible for funding if the service population receives the appropriate supportive services and the applicant designates a minimum occupancy period for residents.

17) **Affordability Requirements:**

Affordable units are defined as units affordable to households at or below 80% of the area median income.

Developments must commit to the following rent restrictions, based on the location and funding source of the proposed project.

Developments located in a Participating Jurisdiction (PJ):

- A minimum of 40% of the affordable units must be affordable to households with incomes at or below 50% of AMI for the entire affordability period; and
- (HCGF only) In addition to the above, a minimum of 10% of units must be affordable to and occupied by households at or below 35% of AMI for the entire affordability period.

Developments located in a Non-PJ:

- A minimum of 35% of the affordable units must be affordable to households with incomes at or below 50% of AMI for the entire affordability period; and
- (HCGF only) In addition to the above, a minimum of 5% of units must be affordable to and occupied by households at or below 35% of AMI for the entire affordability period.

Projects utilizing NHTF:

Projects funded with NHTF have additional rent restrictions that cannot overlap with the above. In no case shall rent plus utilities on any NHTF-assisted unit(s) exceed 30% of AMI. Projects funded with NHTF must also commit to the greater of either:

- 10% of the affordable units rent restricted at 30% of 30% AMI; or
- 5 units rent restricted at 30% of 30% AMI.

Rents established by project-based contracts may increase, as allowed, by that project-based assistance. Existing tenants may not be displaced to achieve the minimum occupancy percentage by very low-income households. Occupancy in up to 60% of the development by households with higher incomes is to occur over time; at turnover, units may be leased to higher income households.

NOTE: If the unit receives federal or state project-based rental subsidy, the maximum rent is the rent allowable under that rental subsidy program as long as the tenant pays no more than 30% of tenant's adjusted income.

18) **Programs:**

Housing Development Gap Financing (HDGF)

The HDGF program utilizes OHTF, NHTF, and HOME funding to provide financial assistance to developments that do not receive HTCs. HDGF projects involve rehabilitating existing affordable rental housing or creating new units of affordable rental housing for households with low incomes and/or special needs. Projects must have a minimum of four (4) units.

Eligible Activities:

HDGF resources in the development budget may only be applied toward non-related third-party acquisition costs, hard costs associated with new construction or rehabilitation, developer fees, and eligible soft costs associated with the project.

On a case-by-case basis, the cost of previously purchased land may be considered as a portion of the total costs and therefore may be eligible for reimbursement.

HDGF resources may be utilized in mixed-use buildings; however, the HDGF application must only represent the development's residential portion. The residential income must support the development and operating expenses of the residential portion.

Funding Limit:

Total HDGF funds in the development cannot exceed 50% of the project's total cost. OHFA may, on a case-by-case basis, agree to subsidize more than this based on the local resources available, the development design or the project location.

Award amounts will be based on funding availability and the needs of the project.

No local government match requirement will be imposed on these developments.

Housing Credit Gap Financing (HCGF) & Bond Gap Financing (BGF)

The HCGF program utilizes OHTF, NHTF, and HOME funding to provide gap financing assistance to developments using competitive (9%) HTC's to renovate or construct affordable housing serving low- and moderate-income households.

The BGF program utilizes OHTF and HOME funding to provide gap financing assistance to developments using multifamily bonds with non-competitive (4%) HTC's to renovate or construct affordable housing serving low- and moderate-income households.

Eligible Applicants:

Eligible HCGF and BGF applicants are private housing developers and public housing authorities seeking tax credits in the current HTC program year. All applicants must have a material interest in the ownership structure of at least 25%. Community Housing Development Organizations (CHDOs) must be the sole general partner.

Funding Limits:

The following limits will be placed on projects in the HCGF program:

- \$600,000 for eligible CHDO projects, or an amount approved by OHFA based on the needs of the project and/or funding availability.
- \$300,000 for non-CHDO projects, or an amount approved by OHFA based on the needs of the project and/or funding availability.

Award amounts for the BGF program will be based on funding availability and the needs of the project.

OHFA may impose a local government match requirement. The amount of match required will depend on the amount of federal funds the Participating Jurisdiction receives as well as the nature of the proposed development. OHFA will adopt a broad definition for what constitutes match funding including, but not limited to, tax abatements, government-donated land, and local HOME or OHTF dollars.

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.

19) **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.

20) **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.

21) **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, NHTF, OHTF, 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 HDGF program will follow the allocation system established in the OHFA QAP. OHFA reserves the right to prioritize the following: permanent supportive housing developments; developments located in HUD Non-Participating Jurisdictions; projects that have not previously received an award of HDAP funds; projects providing additional units at or below 30% AMI; developments in which at least 25% of the total affordable units are three- or more bedroom units; projects located in a High or Very high Opportunity census tract as defined by OHFA's USR Opportunity Index; projects owned or developed by a state-certified CHDO; or developments meeting other strategic priorities as OHFA deems necessary.

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 non-Participating Jurisdictions, projects preserving existing affordable housing, or projects undergoing a RAD conversion, as well as projects meeting the priorities specified in the NHTF Allocation Plan.

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- or 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).

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.

22) **Application Submission:**

Applications must be submitted on a compact disc, 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.

Community Housing Development Organization (CHDO) Competitive Operating Grant Program

Goal: To provide operating support to organizations to continue developing affordable housing.

Total Funds Available: The budget for this competitive program will be set at a maximum of \$100,000. The maximum grant award is \$50,000 per organization, and the grant award, along with any other local HOME operating grants, must not exceed 50% of the organization's total operating budget.

If any portion of this allocation remains uncommitted after the application deadline, those funds may be reallocated to the PY 2020 HDAP. In its sole discretion, OHFA reserves the right to reallocate funds to developments that received HDAP awards in prior fiscal years that have not yet completed construction or placed into service.

Grant Terms: Grants will be written for a 12-month period.

Eligible Applicants: The organization must be a state-designated CHDO for a development that is partially funded by the State of Ohio's 15% HOME funds set-aside and has not yet met the "project completion" definition. Project completion means that the organization completed all the necessary title transfer requirements and construction work; the project complies with the requirements of this part (including the property standards under §92.251); the organization received its final drawdown of HOME funds for the project; and the project completion information has been entered into the disbursement and information system established by HUD, except that with respect to rental housing project completion, for the purposes of §92.502(d) of this part, project completion occurs upon construction completion and before occupancy.

Eligible HOME CHDO Operating Activities: Activities including, but not limited to, the following are eligible:

- Administrative and support staff costs, including fringe benefits, for staff directly involved in housing development activities; and
- Non-staff administrative costs such as supplies, travel, equipment, space and maintenance, telephone equipment and service, postage, printing and duplicating and staff and board training.

Ineligible HOME CHDO Operating Activities:

- Operating costs incurred by a CHDO operating as a sub-recipient or contractor under the HOME program for a specific development;
- Pre-development costs such as engineering, architecture, options, marketing, market studies, etc.; and
- All activities related to administering the Community Housing Impact and Preservation Program, Community Development Block Grant, Community Service Block Grant, or other local, state, or federal programs in which the CHDO acts as a sub-recipient.

OHFA will evaluate the program's need and efficiency during PY 2020 and reserves the right to redirect CHDO Operating Grant resources to the HDAP as needed.

Homeless Crisis Response Program

Goal: To prevent individuals and families from entering homelessness, provide for emergency shelter operations and rapidly move persons from homelessness to permanent housing as quickly as possible.

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

Rapid re-housing is the priority of these funds and should be allocated throughout the homeless planning region based on the need for rapid re-housing assistance. Homelessness prevention funds should be limited for use by persons who are in a doubled-up situation, being forced to leave and facing imminent homelessness.

The HCRP consists of funding from the Ohio Housing Trust Fund and the federal ESG program. The Office of Community Development (OCD) incorporates the requirements of both funding sources as well as the Ohio Basic Shelter Standards into a uniform set of requirements so that all HCRP-funded projects are governed by the same requirements. The ESG program's regulations are found in the Code of Federal Regulations at 24 CFR Part 576.

Eligible Applicants: Funding is available to eligible nonprofit organizations and units of local government for emergency shelter activities, and to state-selected nonprofit organizations and local units of government for homelessness prevention and rapid re-housing activities.

Only one state-appointed organization per Homeless Planning Region (see Map 9) is eligible to apply for homelessness prevention and rapid re-housing funds on behalf of the region. To apply for homelessness prevention and rapid re-housing funds, each region must have a collaborative, Regional Homeless Service Coordination Plan (regional plan). Regional plans should include agreed upon participant screening criteria, common assessment tools and referral processes, and each participant in the region implementing the program must use the same forms.

Note: All agencies applying for emergency shelter funding must participate in this planning process and be listed in the Regional Homeless Service Coordination Plan to be eligible for emergency shelter funds.

Total Funds Available: SFY 2021 Ohio Housing Trust Funds (amount to be determined); 2020 federal Emergency Solutions Grant funds \$6.1 million

Funding Method:

Emergency Shelter Activities: Shelter projects must meet the Ohio Basic Standards for Emergency Shelters (<https://development.force.com/OCDKnowledgeArticles/s/article/Resources-for-Supportive-Housing-Grantees>) as well as the requirements listed in the Ohio Development Services Agency's current Ohio Consolidated Plan Annual Action Plan to receive and continue to receive HCRP funding.

Shelter projects currently funded by the OCD and in good standing are eligible to apply for funding based on the previous funding level. Those projects are eligible for renewal of the previous grant amount.

Homelessness Prevention and Rapid Re-Housing Activities: Funding for homelessness prevention and rapid re-housing activities will be available via an allocation methodology through state-selected regional applicants. This formula allocation will assure at least minimum crisis response funding levels are available for persons at imminent risk of homelessness or persons who are homeless in all areas of the state.

Equal Access:

Organizations that operate homeless projects must ensure compliance with the Equal Access to Housing Final Rule. Any group of people that present together for assistance and identify themselves as a family, regardless of age, relationship, gender or other factors, are a family and must be served together as such. Family

members cannot be separated from other family members during their program stay. Projects may not limit housing and services to specific types of family compositions (e.g. women with children or married couples with children). In addition, emergency shelters and other segregated facilities must make their resources available to individuals and families without regard to actual or perceived sex, sexual orientation or gender identity.

Housing First:

The Housing First model is a best practice standard with the goal of reducing barriers to persons experiencing homelessness by providing placement into shelter/permanent housing first, and then providing supportive services to resolve barriers to maintaining housing. The approach is designed to serve the basic needs of the person before addressing or working to resolve complex barriers to housing stability. Core elements include, but are not limited to, no sobriety and minimum income requirements, and participation in services is voluntary and tenant-driven with service goals that emphasize engagement and problem-solving to retain housing or discharge from shelter.

Eligible Activities:

Emergency Shelter*:

- 1) **Shelter Operations** - Funds to operate and staff an Emergency Shelter program and supportive service costs to provide limited case management, goal planning and permanent housing placement.
- 2) **Data Collection and Evaluation** - Costs associated with data collection/evaluation, including Homeless Management Information System(HMIS) related activities.
- 3) **General Administration** - General Administration funds limited to administration costs of the portion of the Homeless Crisis Response Program grant for Emergency Shelter activities.

* For the purposes of this program, emergency shelters that restrict admission to domestic violence victims are not eligible for funding.

Homelessness Prevention and Rapid Re-housing:

- 1) **Homelessness Prevention** – Financial assistance including rental assistance; rental application fees; rental arrears; security and utility deposits; utility payments; moving cost assistance and, in certain circumstances, motel and hotel vouchers. Housing Relocation and Stabilization Services, which include case management; outreach and engagement; housing search and placement services; and credit repair, are also eligible.
- 2) **Rapid Re-housing** - Financial assistance including rental assistance; rental application fees; rental arrears; security and utility deposits; utility payments; moving cost assistance and, in certain circumstances, motel and hotel vouchers. Housing Relocation and Stabilization Services, which include case management; outreach and engagement; housing search and placement services; and credit repair, are also eligible.
- 3) **Data Collection and Evaluation** - Costs associated with data collection/evaluation, including HMIS- or comparable database activities.
- 4) **Administrative Costs** – Funds may be used for grant fund accounting, preparing reports, obtaining program audits, similar costs related to administering the grant during the grant's work completion period and staff salaries associated with these administrative costs. Administrative costs also include training for staff who will administer the program or case managers who will serve program participants, if this training is directly related to learning about HCRP. Please note that requests for this line item cannot exceed 5% of the total grant request.

Matching Requirements: Emergency shelter applicants must provide at least \$1 in public or private resources for every \$2 in Homeless Crisis Response Program funds. Grants or loans from the Ohio Development Services Agency cannot be used as match. No match is required for the housing stability category.

Threshold Requirements:

- Proposals for emergency shelter activity funds must be included in the Regional Homeless Service Coordination Plan to be considered for funding;
- Applicants must be participating in the appropriate HMIS or comparable database and meet minimum data quality standards;
- Proposals must include documentation verifying commitments of matching funds to sufficiently meet the match requirements;
- Emergency shelter and rapid re-housing activities must be targeted to households who are literally homeless;
- Homelessness prevention activities must be targeted to households at risk of imminent homelessness with the priority being persons who are in a doubled-up situation;
- Homelessness prevention and rapid re-housing programs must be targeted to households below 30% of area median income. Income verification and documentation are required at intake; however, income is not an eligibility factor for rapid re-housing assistance until 90 days after initial intake unless the region has a waiver from the OCD in which case it is one year after initial intake;
- Projects must include the following Housing First elements: low-barrier entrance requirements for income, sobriety, criminal history and other limiting conditions. No drug/alcohol testing as a condition of eligibility; and
- For youth shelters, the parent organization must be accredited by a recognized accreditation organization such as Council on Accreditation (COA), Commission on Accreditation of Rehabilitation Facilities (CARF), or The Joint Commission on Accreditation of Healthcare Organizations (JCAHO) or, be licensed by the Ohio Department of Job and Family Services (ODJFS) to provide emergency shelter for youth.

Reduction of Grant Request: The OCD reserves the right to award grants at amounts lower than requested in the application or less than the amount listed in the allocation amounts provided with the application materials.

Program Amendments: Because grant awards are based on the projects proposed in the application, grantees receiving Homeless Crisis Response Program funds are discouraged from changing their approved projects. The OCD will consider, on a case-by-case basis, only those changes that do not negatively affect the scoring of the original competitively awarded grant. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments or grant deadlines, must submit a Grant Amendment Request in OCEAN. The following exemptions exist for program budgets:

Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is outlined in the OCD Policy Notice 18-01, Grant Operations and Financial Management Policy. The OCD will consider amendment requests in application scoring during future funding rounds.

For Housing Stability grants, a formal grant amendment is only necessary when a grantee wishes to transfer funds into a restricted budget category (administration or data collection/evaluation). Non-restricted activities (homelessness prevention, rapid re-housing) are exempted from the standard 10% or \$5,000 threshold in determining the need for a budget amendment. While a budget amendment is not needed to move funds between homelessness prevention and rapid re-housing activities, increasing the amount of funds expended on homelessness prevention will negatively impact scoring in future rounds of funding.

Application Submission: Applicants must submit applications for the Homeless Crisis Response Program by 11:59 p.m. on July 23, 2020.

Grant Award Notification: Approximately four months after submission, following Controlling Board approval

Supportive Housing Program

Goal: To facilitate moving homeless persons to permanent housing by providing transitional housing and provide long-term permanent supportive housing to homeless persons with disabilities.

Total Funds Available: SFY 2021 Ohio Housing Trust Funds (amount to be determined).

Funding Method: Supportive Housing Program (SHP) funds will be awarded for eligible transitional housing and permanent supportive housing projects that score highest when reviewed by the OCD using the rating criteria outlined below. Projects will be funded at the amount currently funded for a two-year period with up to an increase of five percent, based on funding levels.

Eligible Applicants: Nonprofit organizations, units of local government, public housing authorities and consortia of any eligible applicants may apply for funding. The priority for transitional housing awards is projects that serve special homeless populations (transition age youth, domestic violence victims, persons with mental illness persons in recovery from substance abuse and young families) or those that comply with a national best practice and research-supported design. The priority for permanent supportive housing is projects that meet the housing needs of homeless families and individuals with disabilities including Chronically Homeless persons. Projects that are not currently SHP grantees will not be eligible for funding in this round of funding.

Eligible Activities:

Transitional Housing:

Facility-based or sponsor-based program models, either single-site or scattered-site, which serve households that are homeless according to the HUD definition, excluding category 3, with incomes at or below 35% of Area Median Income (AMI) at the time of program entry. The preference is for programs with an average length of stay less than 12 months.

- Rental payments to support operating transitional housing projects designed to place clients in permanent housing.
- Supportive services designed to help program participants attain permanent housing and housing stability.
- Operating expenses to support recurring costs which include both staffing and non-staff costs associated with operating the program.
- Administrative expenses such as accounting for grant funds, preparing reports, obtaining program audits, training about the Supportive Housing Program for staff who will administer the program and case managers who will serve program participants.
- Data collection and evaluation including costs associated with using a Homeless Management Information System (HMIS) or a comparable database. Eligible costs include purchasing HMIS or equivalent software and/or user licenses; training to use software; leasing or purchasing computer equipment for providers and the central server; and staffing for data collection, entry, analysis operating the HMIS.

Permanent Supportive Housing:

Facility-based or sponsor-based program models, either single-site or scattered-site, which serve households that are homeless according to the HUD definition, excluding category 3, have a HUD-defined disability (mental illness, chemical dependency, AIDS/HIV or other permanent physical disability), and household income at or below 35% of AMI at the time of program entry.

- Operating expenses to support recurring costs which include both staffing and non-staff costs associated with operating the program. Administrative expenses such as accounting for grant funds, preparing reports, obtaining program audits, training about the Supportive Housing Program for staff who will administer the program and case managers who will serve program participants.
- Supportive services cost designed to help program participants maintain or move to other permanent housing.

- Data Collection and Evaluation including costs associated with using a HMIS or a comparable client-tracking database including purchasing HMIS or equivalent software and/or user licenses; training to use software; leasing or purchasing needed computer equipment for providers and the central server; and staffing for costs associated with data collection, entry, analysis; and operating the HMIS.

All eligible costs for either program (other than audit costs) must be incurred within the work completion period of the grant, and costs incurred prior to the grant agreement start date such as writing the application are ineligible.

Equal Access: Organizations that operate funded Transitional Housing and Permanent Supportive Housing projects must ensure compliance with the Equal Access to Housing Final Rule. Any group of people that present together for assistance and identify themselves as a family, regardless of age, relationship, gender or other factors, are considered a family and must be served together as such. Family members cannot be separated from other family members during their program stay. Projects may not limit housing and services to specific types of family compositions (e.g. women with children or married couples with children). In addition, segregated facilities must make their resources available to individuals and families without regard to actual or perceived sex, sexual orientation, or gender identity.

Matching Requirements: Applicants must provide at least \$1 in public or private resources for every \$2 in Supportive Housing Program funds for transitional housing and permanent supportive housing. Grants or loans from Development cannot be used as matching funds.

Threshold Requirements:

- Proposals must include documentation that the project(s) is supported by the Homeless Planning Region;
- Applicants must be participating in the appropriate HMIS or equivalent. If not a current OCD grantee, agree to participate if awarded funding;
- Proposals must include documentation verifying commitments of matching funds which sufficiently meet the match requirements;
- All program activities must be targeted at people who are homeless according to the HUD definition, excluding category 3; and
- Applications must be thoroughly completed and include all required attachments. Submission of an incomplete application will result in a scoring reduction.

Rating Criteria: The OCD will review applications for completeness and program design. A competitive scoring system will not be used since this is an allocation process.

Program Period: Grantees must complete their program according to the following deadlines:

- (1) All activities must be completed by the end of the 24th month as determined by the work completion date identified in the grant agreement;
- (2) All drawdown requests must be submitted to the OCD within one month of the work completion deadline; and
- (3) All funds must be disbursed and expended, and a final performance report must be submitted to the OCD within two months of the work completion deadline.

Reduction of Grant Request: The OCD reserves the right to award grants at amounts lower than requested in the application.

Application Submission: The Supportive Housing Program application submission deadline is 11:59 p.m. on August 20, 2020.

Grant Award Notification: Approximately four months after submission, immediately after Controlling Board approval.

Housing Opportunities for Persons With AIDS (HOPWA) Program

Goal: Through the federal HOPWA Program, the OCD provides eligible nonprofit organizations or units of local government with funds to devise long-term, comprehensive strategies to meet the housing and supportive service needs of persons with AIDS or HIV-related diseases.

Total Funds: Approximately \$2.1 million in federal HOPWA Program funds.

Eligible Applicants: Private, nonprofit organizations incorporated with Ohio's Secretary of State and granted 501(c)(3) status by the Internal Revenue Service and units of local government.

Grant Ceiling: The maximum grant request is based on the percentage of cases of Persons Living with HIV/AIDS within the project's service area when compared to the balance of state (areas outside the Columbus, Cincinnati, and Cleveland service areas). Figures promulgated by the Ohio Department of Health are used for this calculation. An adjustment factor of 1.10 is used to account for increased need. The OCD may consider requests for amounts that exceed the maximum amount; however, written approval from the OCD must be obtained by the dates listed in the application.

Eligible Activities:

- Short-term rental, mortgage and/or utility assistance;
- Acquiring, rehabilitating or constructing permanent housing;
- Tenant-based rental assistance;
- Operating a community residence;
- Permanent housing placement;
- Referral to drug and alcohol abuse treatment and counseling;
- Limited case management;
- Respite care;
- Food/nutritional services;
- Activities of daily living;
- Day care;
- Transportation;
- General administration;
- Housing information services ; and
- HMIS.

Equal Access: Homeless projects must ensure they comply with the Equal Access to Housing Final Rule. Any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are a family and must be served together as such. Family members, regardless of age, gender, or other factors, cannot be separated from other family members during their program stay. Projects may NOT limit housing and services to certain types of family compositions (e.g. women with children or married couples with children).

Matching Requirements: The applicant must match the requested amount of HOPWA funds at a minimum ratio of 1:1.

Rating System Principles:

- 1) Degree to which the proposal meets the needs of the target population;
- 2) Evidence of local resource coordination and need for grant resources;
- 3) Evidence of local support;
- 4) Financial stability/management and applicant/administering agency stability; and
- 5) Applicant's ability to administer the program/administrative capacity

Rating Criteria: The OCD will rate the applications based on the following selected criteria:

- 1) Need (15 points): Projects will be evaluated based on the degree to which they meet the unmet needs of the community to be served by the program; need of the area's population for HOPWA-eligible programming and services as described in the Consolidated Plan; and extent to which the proposal is consistent with local needs and fits into a community-wide strategy addressing those needs.
- 2) Program Design (30 points): Projects will be evaluated based on the type and quality of proposed activities: emphasis on housing and housing-related activities, especially operating a community residence providing long-term housing, outreach and referral systems; criteria for selecting residents for housing and services, method for verifying client eligibility and ensuring that client needs cannot be met through other programs, case management plan and how that plan will help meet the client's needs; measures ensuring that clients receive the appropriate type, delivery and level of service, and rational for discontinuing or limiting services. HMIS data performance will be based on data entered in HMIS; applicants must demonstrate acceptable performance. At a minimum specific performance measures will include the following:
 - Occupancy rates
 - Average length of stay
 - Percentage of leavers exiting to a permanent destination

In addition, the OCD will evaluate the HMIS data quality including, but not limited to, null and missing values.

- 3) Coordination (20 points): Projects will be evaluated on the degree to which they coordinate with other mainstream organizations in the community to meet the housing and service needs of persons with AIDS; and extent of coordination with units of local governments, local health departments, or other organizations serving persons with AIDS or related diseases.
- 4) Financial Management (25 points): Projects will be evaluated based on their financial management practices; internal control procedures, proposed budget reasonableness, and amount and diversity of other funds committed.
- 5) Administrative Capacity (10 points): Projects will be evaluated on the organization's staff capability to implement the proposed project: organization's history, including its experience in implementing the proposed activities; key staff's relevant educational background, professional certifications, licenses and work experience, and performance on current grant, if applicable.

Program Period: Grantees must complete their program according to the following deadlines:

- (1) All activities must be completed by the end of the 12th month;
- (2) All drawdown requests must be submitted to the OCD by the end of the 13th month; and
- (3) All funds must be disbursed and expended, and a final performance report must be submitted by the end of the 14th month.

The OCD is considering awarding grants for a two-year period. Since funds are awarded by HUD for only a one-year period, this would require the OCD to make a two-year commitment of funds to the selected grantees, pending additional funding by HUD the following year. This will result in a grant agreement for the first year and necessitate a grant amendment to add the second year of funding and to extend the grant for one year.

Reduction of Grant Request: The OCD reserves the right to award competitive grants at amounts lower than requested in the application.

Application Submission: The HOPWA application submission deadline is 11:59 p.m. on October 29, 2020.

Grant Award: Approximately seven (7) weeks after submission.

Community and Economic Development

- **Community Development Program:**
 - *Allocation Grants*
 - *Neighborhood Revitalization Grants*
 - *Critical Infrastructure Grants*

- **Economic Development Loan and Public Infrastructure Grant Program**
 - *Economic Development Loan Program*
 - *Economic Development Working Capital Loan Program*
 - *Economic Development Public Infrastructure Grant Program*
 - *Residential Public Infrastructure Grant Program*

Community Development Program

Goal: To provide communities with a flexible housing and community development resource that can be used to address locally identified needs that are eligible Community Development Block Grant (CDBG) activities and qualify under the national objective of Low-and Moderate Income (LMI) Benefit or Elimination of Slum and Blight.

The program will include funds for the Neighborhood Revitalization competitive set-aside program and the open-cycle Critical Infrastructure program.

Neighborhood Revitalization projects are designed to improve the quality of life, livability, and functionality of distressed areas and neighborhoods to carry out a comprehensive revitalization strategy. This includes projects designed to stabilize and enhance LMI residential neighborhoods.

Critical Infrastructure projects are designed to assist applicant communities with high-priority, single-purpose infrastructure improvements. This includes roads, storm drainage, fire protection facilities, and other public facilities projects. Water and sanitary sewer projects not eligible for the Residential Public Infrastructure Grant (RPIG) may also be considered for Critical Infrastructure program funding.

Total Funds: Approximately \$24.4 million in federal PY 2020 CDBG. Fifty (50) percent of Ohio's total CDBG allocation will be committed to the Community Development Programs. An amount to be determined will be distributed through the Allocation Program with the remaining funds allocated to the PY 2020 competitive and open-cycle programs, including the Neighborhood Revitalization and Critical Infrastructure Programs. Funding selections will be based on a comprehensive application review submitted for all Community Development Programs.

Application Guidelines: Communities may apply for the Allocation Program biennially. Cities may apply for one Neighborhood Revitalization program award biennially. Counties may apply for up to two Neighborhood Revitalization program awards on behalf of different local jurisdictions biennially. Cities may apply for up to two Critical Infrastructure program awards annually. Counties may apply for up to three (3) Critical Infrastructure program awards annually.

A community's eligibility to receive PY 2020 competitive set-aside programs is reduced, based upon its existing open competitive set-aside programs. Cities may have one and counties may have up to two Neighborhood Revitalization program awards open at a time. Both cities and counties may have up to three (3) Critical Infrastructure open at a time.

Communities may apply for multiple combinations of competitive set-asides. Communities may not apply for more competitive set-asides than they are eligible to receive. See table below for maximum annual competitive applications, based upon set-aside program and applicant type:

Neighborhood Revitalization Program	County	Direct City
Number of Applications	2	1
Number of Open Grants	2	1

Jurisdictions awarded prior Neighborhood Revitalization competitive set-aside program funds may not reapply for PY 2020 Neighborhood Revitalization funds unless the previous grant has been monitored and significant monitoring issues resolved. Unsuccessful Neighborhood Revitalization Program applicants may reapply, and successful communities may apply for alternative jurisdictions.

Critical Infrastructure	County	Direct City
Number of Applications	3	2
Number of Open Grants	3	3

A project cannot be included in multiple competitive set-aside or open cycle program applications, and funds from one competitive set-aside or open cycle program cannot be used as leverage for another competitive

application. Similarly, Allocation and/or competitive program funds from previous fiscal years cannot be used as leverage for a community's PY 2020 application.

Administrative capacity will be considered for multiple grant awards for a single applicant.

Competitive Set-Aside Close-Out Process: Communities can request the OCD monitor and close a competitive set-aside project if the project is complete with all funds drawn and expended by April 30, 2020. The community must submit a written request to the OCD by April 30, 2020.

Allocation Grants

Total Funds: Amount to be determined

Allocation Calculation Principles: Funding allocations for communities are determined by the following formula:

Number of LMI Individuals in the Community/Total Number of LMI Individuals in Non-Entitlement Areas X
Amount of CDBG Program Funds allocated for Community Development

A biennial grant floor of \$150,000 will be set to ensure adequate funding for eligible applications. The U.S. Department of Housing and Urban Development (HUD) provides the number of LMI persons and uses the 2011 - 2015 American Community Survey Low/Moderate Income Summary Data (updated in 2020) as the basis for estimating LMI figures. The funding allocation calculation will be completed for all non-entitlement cities and counties. *Direct cities* are cities with a total population of 15,000 or greater and a LMI population of at least 30% as determined by the 2010 Census and 2006-2010 American Community survey Low/Moderate Income Summary Data (updated in 2014).

The funding allocation for cities that do not meet the direct city criteria will be awarded to the county of jurisdiction. The funding allocation for cities attaining a total population of 15,000 or greater and a LMI population of at least 30% with subsequent data releases (e.g. 2011-2015 American Community Survey Low/Moderate Income Summary Data (updated in 2020)) will be provided as dedicated funding to the county of jurisdiction at the \$150,000 grant floor. All communities within the county are encouraged to collaborate with the county for project funding consideration.

Waiver or Surrender of Funds: A county or city may choose to surrender all or part of its funding allocation to the state. Appropriate legislative action must be taken in this regard by the local government, and a copy of this action must be submitted to the OCD on or before the Community Development Programs application deadlines. **In the event funds are not committed to eligible activities in the Allocation Program application by the submission date, those funds will be forfeited.**

A city or county may opt to use its Allocation Program funds as local match for CDBG competitive or open-cycle programs. This can be accomplished through the respective competitive application process. The project or activity must be identified as an activity in the Allocation application, even if the competitive program funds have not yet been awarded. Competitive applications must be submitted by the Allocation Program deadline to ensure simultaneous review. **Communities must select alternate projects for Allocation program funds in the event the community does not receive a competitive award. Funds are not guaranteed and delays due to failure to select alternate projects can result in forfeiting Allocation Program funds.**

State Agency Coordination: Projects including funding from the Ohio Department of Transportation (ODOT) must be bid, contracted, and administered by the local government awarded CDBG funds. The OCD will not consider CDBG funding as match for an ODOT-administered project, unless the CDBG activity functions as a stand-alone project with independent bidding, contracting, and completion timelines. or prior written approval of the local government's ODOT participation agreement.

Eligible Jurisdictions: Under the PY 2020 Ohio State CDBG Program, the non-entitlement counties and small cities listed in Table 4 below (identified as cities by the Secretary of State as of January 1, 2015) will be

able to apply for funds based entirely on the number of low- and moderate-income persons residing in the eligible community. Approximately 50% of the eligible communities will apply for funding in PY 2020. The remaining 50% will apply for funding in PY 2021.

The following categories of communities will not receive funding under the Allocation Program:

- 1) HUD Entitlement Cities (35);
- 2) HUD Urban Counties (10); and
- 3) Units of general local government with more than 50% of their population in an urban county.

Adjacent cities and/or counties may pool Allocation Program funds for a common project(s) and may designate one unit of government or a recognized regional organization to administer the program on behalf of the participating units of government. All parties involved must execute a legal agreement and receive approval from the OCD.

Eligible Activities: Eligible activities are outlined in Title I of the Housing and Community Development Act of 1974, as amended. To meet its community development needs, an Allocation Program grantee can select among those eligible activities.

Allocation Program funds cannot be used for housing activities, except for Home Repair. The OCD has funds set aside for these purposes through its Community Housing Impact and Preservation (CHIP) Program. In the event a community applies, but is not funded for a CDBG-eligible housing activity through the CHIP Program in the current or previous year's application cycle, the OCD will consider a community's request to waive this requirement and use Allocation Program funds for other CDBG-eligible housing activities. Waiver consideration will be based on the community's CHIP Program application competitiveness along with demonstrated administrative capacity to administer a housing program. Communities must select alternate projects for Allocation Program funds in the event the OCD does not approve a waiver request. Waivers are not guaranteed and delays due to failure to select alternative projects can result in forfeiting Allocation Program funds.

Allocation Program grantees are not allowed to use their program funds to capitalize or re-capitalize local Revolving Loan Funds or acquire property for land banking for future new housing development construction.

Economic Development activities that are qualified under the LMI Direct Benefit Job Creation national objective are not eligible for Allocation, competitive set-aside or open cycle program funding. Communities should consider the Economic Development or Revolving Loan Fund Programs for projects that will create or retain permanent, private sector job opportunities.

Application Timing:

Application Submission: June 17, 2020
Grant Award: September 1, 2020

Holdover Option: Communities will not be permitted to holdover PY 2020 funds for combination with future program years.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with, or prior to, submitting a funding application for a specific community development project. The OCD may also require jurisdictions benefitting from Allocation Program projects to commit Revolving Loan Funds as leverage.

Community Development Implementation Strategy: Communities receiving funds from the OCD are required to conduct long-term planning. The Community Development Implementation Strategy (CDIS) is a tool to facilitate communication with stakeholders in eligible applicant communities. The CDIS will supplement the required Citizen Participation process, providing a format for disseminating information about the

Community Development, Economic Development, Residential Public Infrastructure Grant and Target of Opportunity Programs, and assist with identifying and prioritizing potential funding opportunities. The CDIS is required for application to the PY 2020 Community Development, Economic Development Residential Public Infrastructure Grant and Target of Opportunity Programs. The OCD recommends applicants to the PY 2021 Allocation Program conduct the CDIS in 2020 to allow adequate time for project identification and development; however, PY 2021 communities are not required to submit the CDIS until Allocation applications are due.

Programmatic Funding Guidelines:

Administrative Costs: Grantees may use up to 20% of the total grant for general administration, implementation and fair housing costs. General administration costs include citizen participation, application preparation, grant agreement, environmental review, drawing down funds and overall recordkeeping, reporting, audit(s) and closeout, program compliance. and performance in accordance with the OCD Policy Notice 18-01: Grant Operations and Financial Management Policy and Procedures

Engineering, architectural and legal service costs, which are related to activities undertaken with CDBG funds, can be charged to the specific activity line item budget.

Low-to-Moderate Income (LMI) benefit: Regardless of which national objective a local grantee intends to meet, the program's overall benefit to LMI persons shall be at least 51%, excluding general administration, planning and fair housing. The 51% overall benefit requirement applies to all jurisdictions that receive an Allocation Program, regardless of the administering entity.

In determining whether an activity will benefit LMI persons, the OCD will consider a completed activity's net effect. Thus, an activity located in a LMI area, while generally a primary consideration, does not conclusively demonstrate that the activity benefits LMI persons. An activity that serves an area delineated and justified by the grantee, where most of the residents are LMI persons, will meet the LMI standard. (The OCD Policy Notice 19-02, Qualifying Community Development and Residential Public Infrastructure Projects using Community Development Block Grant National Objectives, provides guidance on meeting the LMI National Objective.)

Communities may request a waiver to use more than 49% of the funds for activities that qualify under the slum and blight national objective. Waiver requests must be submitted to the OCD as an application attachment.

Public Service Activities: Allocation funds can be used for public service activities if the proposed activity is a new service, or a quantifiable increase in the level of an existing service above that which has been provided by or on behalf of the community with local government funds during the past program period. This requirement is intended to prevent the substitution of CDBG funds for recent support of public services by the grant recipient using local or state government funds. The prohibition on substituting CDBG funds for recent local or state government funding does not include the substitution of CDBG funds for private or other federal funding of a public service. It also does not prevent continued funding of a CDBG-funded public service at the same or smaller level in the subsequent program year.

There is not a cap on the percent of funds requested for PY 2020 public service activities. Communities may use no more than 15% of the total grant funds, including general administration, fair housing and planning, for eligible public service activities. Communities may request a waiver to exceed the 15% cap. Waiver requests must be submitted to the OCD as an application attachment and will be considered on a case-by-case basis.

Public services include, but are not limited to:

- Child care,
- Health care,
- Job training (including training a qualified pool of candidates for unspecified jobs.
- Recreation programs,
- Education programs,
- Public safety services,

Fair housing activities

Services for senior citizens,
Services for homeless persons, and victims of domestic violence,
Drug abuse counseling and treatment,
Energy conservation counseling and testing,
Homebuyer down payment assistance,
Emergency assistance payments (emergency monthly housing payments), and
Legal services (including walk-in legal counseling, foreclosure mitigation and prevention, landlord/tenant matters, veterans and public benefit appeals, child support orders, reasonable accommodations for persons with disabilities, and consumer protection).

Eligible public service costs include the purchase or lease of labor, equipment, furnishings, materials, and supplies. Paying the cost of operating and maintaining that portion of a facility in which the service is located is also considered to fall under the basic eligibility category of Public Services, even if such costs are the only CDBG-funded contributions for those services.

Planning Activities: Allocation Program funds can be used for planning activities related to eligible CDBG projects that will meet the LMI or slum and blight national objective. Planning activities will not count towards the grantee's maximum project cap. Planning activities will also not count towards the 20% cap on general administration and fair housing. To qualify for funding, planning activities must meet the following requirements:

- 1) The planning being undertaken must be for an eligible CDBG activity;
- 2) The planning activity must specifically identify the community's low- and moderate-income or slum and blight needs;
- 3) The planning activity must produce a tangible product (e.g., report or historical inventory) for the OCD to review;
- 4) The planning activity can be undertaken only for activities that, upon implementation, meet either the low- and moderate-income or slum and blight national objectives;
- 5) The planning activity must further the State of Ohio's investment objectives; and
- 6) The planning activity's product should be used to further develop and design future applications to meet local community and economic development needs.

Communities may use no more than \$20,000 for eligible planning activities. Communities may request a waiver to exceed the \$20,000 limit. Waiver requests must be submitted to the OCD as an application attachment and will be considered on a case-by-case basis.

Home Repair Activities: All program delivery and other soft costs related to work on a specific unit meeting a national objective must be paid for in one of two ways: (a) these costs may be charged to the activity budget (unit), or (b) these costs may be charged to administration. All program delivery or soft costs associated with projects that do not meet a national objective must be charged to administration. Eligible soft costs for the CDBG Program are defined at 24 CFR Part 570.202(b)(9).

Home Repair activities must be implemented in accordance with Ohio's Housing Rehabilitation Handbook. Grantees must develop and adopt a local Policies and Procedures Manual. Policy Notice OCD 15-03, Finance Mechanisms, provides guidelines for finance mechanisms for all the OCD funds.

Fair Housing: Communities are required to include a fair housing activity as part of the PY 2020 Community Development Programs application. The proposed program should cover the period from January 1, 2021 through December 31, 2022. A fair housing activity can be treated as part of the general administrative budget, but fair housing, planning (except planning as an activity outlined above) and administrative costs cannot

exceed 20% of the total grant amount. **If a community chooses not to fund a fair housing activity with CDBG funds, the application must commit an alternative funding source, include this commitment in the program budget and include a standard fair housing program outcome.** Fair housing can also be funded as a public service activity, although the community will be required to track beneficiaries to assure that at least 51% of the beneficiaries qualify as LMI. Public service activities cannot exceed 15% of the total grant amount, unless the community is granted a waiver.

Any fair housing activity must include a specific program design with quantifiable, measurable services, and identified beneficiaries. Fair housing does not count toward the number of allowable projects an applicant may undertake as outlined below. The state’s fair housing requirements are described in the section entitled *Local Government Certifications to the State*.

PY 2021 Allocation communities are not required to submit a Standard Fair Housing Program plan for PY 2020 but should continue to administer the Standard Fair Housing program identified in their PY 2019 application.

Committing Allocation Program Funds: Grantees committing PY 2020 Allocation Program grant funds to Residential Public Infrastructure Grant (RPIG), Critical Infrastructure (CI) Appalachian Development (AD) or Target of Opportunity (T of O) program projects must reprogram the Allocation funds to other CDBG-eligible activities if the RPIG, CI, AD or T of O application is not approved by September 1, 2020. Allocation, CI, AD and T of O projects that entail major water or sanitary sewer improvements will be evaluated in a similar fashion to RPIG projects even if RPIG is not an identified funding source. Applicants must submit Ohio EPA Permit to Install or Plan Approval, if applicable, and account for new household connections at the time of application.

All project dollars identified at the time of application must be firmly committed by the September 1, 2020 grant award. The OCD will not consider an application for a subsequent grant request for another OCD-administered program (e.g. RPIG, T of O, CI, AD) after Allocation Program funding has been approved.

Number of Projects: The table below identifies the number of projects an Allocation Program applicant may undertake with CDBG funds based on the community’s funding level. Communities will be allowed one additional project for every successful Neighborhood Revitalization or round one Critical Infrastructure program award.

Allocation Funding Level	Projects Available
\$150,000 - \$224,999	4
\$225,000 - \$299,999	5
\$300,000 or more	6

The maximum number of projects for counties includes projects undertaken on a countywide basis in one or more sub-units of government. A project is further defined as national objective and location specific. A project may include one or more activities with the same service area, beneficiaries and national objective. Administration, planning and fair housing will not count toward the allowable number of projects. **Demolition and clearance activities for eliminating slum and blight will each count as one project regardless of the number of units or activity locations.** Activities undertaken in one service area will count as one project. This may include targeted street, water and sewer improvements. Activities undertaken in a well-defined area or neighborhood, which may span over one or more Census areas, will count as one project if the physical improvement is contiguous. The same type of activity (e.g., street improvements) undertaken in various sub-units of government will count for as many projects as the number of service areas in which the activity will be located, regardless of the number of contracts to be let by the grantee.

Dedicated cities funded at the \$150,000 level will be allowed a maximum of 4 projects. These projects are not factored in to the county of jurisdiction’s cap as outlined above.

Benefit Area Income Surveys: The grantee may qualify a project based on an income survey of the project’s benefit (or service) area, (completed according to the OCD Survey Methodology) which shows that at least

51% of the project beneficiaries will be low- or moderate-income. The OCD Survey included in the OCD Policy Notice 19-02, Qualifying Community Development and Residential Public Infrastructure Projects using Community Development Block Grant National Objectives which provides guidance on meeting the LMI National Objective. The grantee is required to submit appropriate survey information to the state.

The OCD may require an applicant to conduct an income survey to qualify a project for program funding if American Community Survey (ACS) data does not appear to adequately represent the LMI proportion of the service area.

Applicants are not permitted to combine ACS data and data from an income survey to qualify a service area.

Projects determined to be ineligible due to an incorrect survey methodology will result in forfeiting Allocation funds unless the survey can be corrected during the application review period. Communities are advised to seek technical assistance from the OCD prior to the application submission deadline.

Urgent Need: Urgent Need is not an eligible national objective for the Allocation Program. The OCD sets funds aside for this purpose through its Target of Opportunity Program.

Integrated Effort: Allocation Program grantees are encouraged to integrate any portion of their Allocation Program funds into any PY 2020 CDBG competitive set-aside programs or the open cycle Critical Infrastructure program. Allocation Program funds can only be committed to competitive set-aside or Critical Infrastructure projects with applications submitted by the June 15, 2020 deadline.

Program Amendments: Because grant awards are based on the projects proposed in the application, Community Development Programs grantees are discouraged from changing approved projects. The OCD will consider, on a case-by-case basis, only those changes that would not negatively affect the approved application's scoring if the project was awarded competitively. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments, or grant agreement deadline must notify the OCD in writing of the proposed changes. The OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required prior to proceeding with the changes. The OCD Amendment Policy is outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures. **In general, amendments will not be allowed for competitively awarded activities.**

Amending Grant Deadlines: Although changing the grant deadline is discouraged, the OCD will allow an amended grant deadline under certain circumstances. The OCD may approve, deny or request additional information regarding the amended deadline request. The OCD must review and approve an amendment to the grant deadline before implementation by the grantee. Amendments to the grant deadline may negatively impact a community's Administrative Capacity rating on future applications.

An amendment to an executed grant agreement deadline is required if all work identified in the grant agreement cannot be completed by the Work Completion Deadline in the executed grant agreement.

Consideration when requesting an Amended Grant Deadline:

- 1) The grantee must submit a written Grant Amendment Request at least two months before the work completion deadline in the executed grant agreement. The request must contain a detailed explanation of why the amended grant deadline is necessary and a revised timeline for project completion.
- 2) The OCD will consider approving an amended grant deadline on a case-by-case basis. Communities requesting an amended grant deadline must demonstrate they attained grant milestones; Environmental Review Release of Funds submission by February 15, 2021, and procuring and executing the project's contract(s) by September 30, 2021. Generally, extensions will be approved for no more than six (6) months after the original Work Completion Deadline.

- 3) Grantees will be notified to enter Grant Amendment Requests in OCEAN for execution.
- 4) **Local Program Period:** The Grant Agreement must be executed and returned to the OCD within ten (10) business days of the award notification date. Failure to do so may result in forfeiting the grantee's allocation. Allocation Program grantees will be allowed up to 26 months to have their PY 2020 programs ready for closeout, beginning with the general date set for all Allocation Program grant agreements. Within this allowable program period, the following deadlines must be met:
 - 5) All work must be completed by the end of the 24th month.
 - 6) All funds must be drawn down by the end of the 25th month. This means that all *Requests for Payment and Status of Funds Report* (Form DS5) must be submitted to the OCD before the end of the last business day of the 25th month. The OCD will not honor any draw down requests after this date, unless the grantee requested, and the OCD approved an extension.
 - 7) Grantees must request and expend all funds and submit a final performance report to the OCD by the end of the 26th month.
 - 8) Grant audit(s) must be conducted in accordance with 2 CFR 200, described in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

NOTE: PY 2020 Neighborhood Revitalization and Critical Infrastructure recipients awarded September 1, 2020 grant agreements will follow the same closeout timeline as the Allocation Program.

Application Submission: Applicants must submit applications to the OCD by 11:59 p.m. on June 17, 2020. The OCD may refuse any incomplete or late applications. **Communities that fail to meet the 11:59 p.m. deadline will forfeit their PY 2020 funding allocation.**

Application Revisions: During the application review process, the OCD may require a community to revise its application or supply additional materials before it can be approved. If necessary, communities will be allowed up to 30 days from the OCD's initial contact to adequately address the application deficiencies. Allocation Program funding is not guaranteed; the applicant's administrative capacity, as demonstrated by the timely, complete and accurate program application submission as well as past program performance will be considered when making funding determinations. Failure to demonstrate appropriate administrative capacity is grounds for forfeiting the community's PY 2020 Allocation Program funding. Likewise, submitting an ineligible activity is grounds for forfeiting a community's Allocation Program funding.

Forfeited Allocation Program funds will be appropriated to the competitive set-aside and open-cycle programs.

Population Redistribution: Under the Allocation Program, cities or villages whose boundaries lie in more than one county shall be considered part of the county with the largest portion of the city's or village's population.

- 1) For cities or villages split by one or more non-entitlement county boundaries, allocations to the counties will reflect the above-mentioned population redistribution. Cities and villages may only apply for funding to the county that contains the largest portion of their population.
- 2) Direct cities split between an urban (CDBG Entitlement) county and one or more non-entitlement counties will be eligible for Allocation Program funding only if the following criteria are met:
 - a. Most of its population resides within the CDBG non-entitlement county;
 - b. Prior to April 30 of any program year, the city must submit in writing to the OCD its intention to participate in the subsequent year's Ohio State CDBG Program; and
 - c. Prior to April 30 of any program year, the city must submit to the OCD written certification from the urban county that the city will not be a participant in the urban county's entitlement program during the upcoming year.

- 3) Cities or villages split between an urban county and one or more State Administrated Program counties will be eligible to participate in the county Allocation Program only if the following requirements are met:
- The majority of the city's or village's population resides within the CDBG non-entitlement county;
 - Prior to April 30 of any program year, the city or village must submit to the non-entitlement county and to the OCD written certification from the urban county that the city or village will not participate in the urban county's entitlement program during the upcoming year; and
 - Prior to April 30 of any program year, the city or village must submit a written statement to the Allocation county and to the OCD, indicating that the city or village intends to be eligible for funding though the county's Allocation Program.

Table 4: PY2020 and PY2021 Allocation Program Counties and Cities

PY 2021 Allocation Program Counties and Cities

County Program Grantees

Adams County	Crawford County	Hardin County	Mercer County	Sandusky County
Ashland County	Defiance County	Harrison County	Miami County	Seneca County
Ashtabula County	Fayette County	Hocking County	Morgan County	Trumbull County
Auglaize County	Fulton County	Jackson County	Perry County	Tuscarawas County
Brown County	Gallia County	Lawrence County	Pike County	Vinton County
Carroll County	Geauga County	Licking County	Putnam County	Washington County
Champaign County	Greene County	Logan County	Richland County	Wayne County
Clinton County	Hancock County	Lorain County	Ross County	Williams County
Coshocton County				

City Program Grantees

Ashland	Fremont	Medina	Piqua	Sidney
Chillicothe	Marion	New Philadelphia	Portsmouth	Zanesville

PY 2020 Allocation Program Counties and Cities

County Program Grantees

Allen County	Fairfield County	Lucas County - Oregon*	Morrow County	Preble County
Athens County	Guernsey County	Madison County	Muskingum County	Scioto County
Belmont County	Henry County	Mahoning County	Ottawa County	Shelby County
Clark County	Highland County	Marion County	Noble County	Union County
Columbiana County	Holmes County	Medina County - Wadsworth*	Paulding County	Van Wert County
Darke County	Huron County	Meigs County	Pickaway County	Wood County
Delaware County	Jefferson County	Monroe County	Portage County - Streetsboro*	Wyandot County
Erie County	Knox County			

*Denotes cities with dedicated allocation via county of jurisdiction

City Program Grantees

Ashtabula	Delaware	Mount Vernon	Tiffin	Wooster
Athens	Findlay	Niles	Troy	Xenia
Defiance	Marysville	Norwalk		

Neighborhood Revitalization Grants

Grant Ceiling: \$750,000

Eligible Applicants: PY 2020 Allocation counties and direct cities. Communities not receiving PY 2020 Allocation funds may not apply for PY 2020 Neighborhood Revitalization Grant funds.

Eligible Activities: Eligible activities include public facilities improvements such as constructing, reconstructing, and/or rehabilitating infrastructure in targeted areas of distress that do not fit within the criteria of other Ohio State CDBG competitive programs. At a minimum, Neighborhood Revitalization program applications must include three activities, excluding administration. Demolition/Clearance activities are capped at \$175,000 or 25% of the project request, excluding administration.

Ineligible Activities:

- Downtown revitalization activities (i.e., the program cannot be used for improvements to an area that would be considered part of the Central Business District);
- Public service or direct benefit activities;
- Housing activities (i.e., the program cannot be used for direct housing assistance such as, but not limited to, private rehabilitation, home repair and down payment assistance;
- Economic development activities (i.e., activities that would involve a loan to a private business or would require creating or retaining LMI jobs to meet CDBG eligibility requirements or infrastructure to benefit a private business. Such activities are more appropriately funded through the CDBG Economic Development Program);
- Large-scale, single-purpose infrastructure projects that are better suited for the CDBG Residential Public Infrastructure Grant (RPIG) or Critical Infrastructure Grant; and
- Planning activities.

Communities funding public service direct benefit and/or housing projects with other sources of funds during the grant period will receive leverage or coordination points for dollars committed to the target area.

State Agency Coordination: Projects including funding from the Ohio Department of Transportation (ODOT) must be bid, contracted, and administered by the local government awarded CDBG funds. The OCD will not consider CDBG funding as match for an ODOT-administered project, unless the CDBG activity functions as a stand-alone project with independent bidding, contracting, and completion timelines. or prior written approval of the local government's ODOT participation agreement.

Local Program Benefit: The program is targeted to distressed communities or areas in Ohio that have a LMI population of at least 51%. An area-wide activity may use ACS data or income surveys to document 51% LMI population. Applicants may submit projects under the area-wide or spot slum and blight categories, in accordance with the OCD Community Development Programs policies and requirements. However, the improvements must still be shown to have at least 51% LMI benefit, and the application will be rated on the same distress factors (LMI beneficiaries). Applicants are required to identify a clearly defined target area that qualifies as at least 51% LMI. Neighborhood Revitalization applicants can only address one target area per application submission.

Administrative Cost: A maximum of \$50,000 or 15% of the total CDBG project cost, whichever is less, may be used for general administration, environmental review, audit and close-out.

Benefit Area Income Surveys: The grantee may qualify a project based on an income survey of the project benefit (or service) area (completed according to the OCD Survey Methodology) which shows that at least

51% of the project beneficiaries will be LMI. The OCD Survey Methodology is included in (the OCD Policy Notice 19-02, Qualifying Community Development and Residential Public Infrastructure Projects using Community Development Block Grant National Objectives, which provides guidance on meeting the LMI National Objective.) **The grantee is required to submit appropriate survey information to the state, including the income surveys collected to support the LMI data.**

The OCD may require an applicant to conduct an income survey to qualify a project for program funding if ACS data does not appear to adequately represent the **LMI proportion** of the service area. **Applicants are not permitted to combine ACS data and data from an income survey to qualify a service area.**

Communities are advised to seek technical assistance from the OCD prior to the application submission deadline.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to submitting a funding application to the state for a specific community development project. The OCD reserves the right to reduce the grant award for successful applicants with Revolving Loan Fund balances.

Program Amendments/Extensions: Because of the competitive nature of the Neighborhood Revitalization awards, grantees receiving Neighborhood Revitalization funds are discouraged from amending their programs. The OCD will consider on a case-by-case basis only those minor changes that do not affect approved project's competitiveness. If the grantee is considering a change in program scope, location or design, number and type of beneficiaries or anticipated accomplishments, it must notify the OCD of the proposed changes in writing. Formal written OCD approval is required. Amendments will be considered in application scoring during future funding rounds. The OCD Amendment Policy is stated in the Office Policies Section of this plan and outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

Redistributing funds between activities within a Neighborhood Revitalization project does not require an amendment if there is no change to the beneficiaries, national objective or scope of work.

Local Program Period: Allocation award recipients receiving Neighborhood Revitalization funds must complete their programs according to the following deadlines:

- 1) all activities (except audit and balance of administration) must be completed by the end of the 24th month;
- 2) all drawdown requests must be submitted to the OCD by the end of the 25th month; and
- 3) all funds must be disbursed and expended, and a final performance report must be submitted by the end of the 26th month.

Grant audit(s) must be conducted in accordance with 2 CFR 200, described in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

Application Timing:

Submission: June 17, 2020
Grant Award: September 1, 2020

The OCD will not issue a separate grant agreement to communities receiving Neighborhood Revitalization funds. Awards will be included in the community's Allocation grant agreement.

Neighborhood Facility Inventory: Communities will be required to complete a Neighborhood Facility Inventory to catalog the existing condition of the public facilities (e.g. streets, sidewalks, community centers, etc.) in the target area and the degree to which the proposed Neighborhood Revitalization program will improve the identified conditions.

Rating System Principles: All applications will be rated according to the following criteria:

- 1) Distress (15 points): Distress points will be calculated based on the percent and number of LMI persons who will benefit from the proposed program.
- 2) Leverage (15 Points): The extent to which the community will leverage other resources. Leverage will be based on the amount of other resources compared to the total grant request and the extent to which the community will coordinate efforts and implement other programs with the proposed activities. Leverage points will be awarded to applicants using all or part of their Economic Development Revolving Loan Funds as matching dollars for Neighborhood Revitalization activities.
- 3) Program Design (50 points): Program impact will be based on the extent to which the activities are based on a comprehensive approach to address needs within the targeted area, the extent to which the activities are consistent with the needs and strategies described in the applicant's Neighborhood Facility Inventory and Community Development Implementation Strategy, and the extent to which implementing the program will result in an improved living environment and quality of life for persons residing in the area. Program impact will also take into consideration the applicant community's and identified administrator's capacity to carry out federal, state and programmatic requirements. Administrative capacity will include experience in administering the following aspects of the OCD-administered programs: complying with the grant agreement(s), adhering to program regulations and policies, resolving monitoring and/or audit findings, and progress in completing activities. Program impact will also take into consideration historical performance and the progress of other projects currently funded with the OCD-administered funds.
- 4) Community Participation (20 points): The extent to which the local citizens and community organizations support selecting the proposed activity: the community's effectiveness in involving local citizens in program planning through the citizen participation process. The planning process should include details regarding information dissemination, project selection and prioritization strategies.

Critical Infrastructure Grants

Grant Ceiling: \$500,000

Eligible Applicants: PY 2020 and PY 2019 Allocation Program counties and direct cities. Counties may apply on behalf of non-direct cities, villages, and unincorporated areas.

Critical Infrastructure Program Principles: The Critical Infrastructure Program was created to assist communities with funding for **high priority, single-purpose** projects, such as roads, flood and drainage and other public facilities projects with high community-wide impact and that benefit primarily residential areas. Projects may include multiple activities that together contribute to a failed or failing condition.

Eligible Activities: Eligible activities include constructing, reconstructing or rehabilitating infrastructure components. Eligible infrastructure components include: streets, bridges, sidewalks, flood and drainage, water and sanitary sewer, fire protection, and community facilities.

Ineligible Activities:

- Public service or direct benefit activities;
- Planning Activities;
- Economic development activities (i.e., activities that would involve a loan to a private business or would require creating or retaining LMI jobs to meet CDBG eligibility requirements or infrastructure to benefit a private business.) Such activities are more appropriately funded through the CDBG Economic Development Program;
- Projects in residential areas addressing deficiencies with multiple infrastructure or public facility-components in multiple locations are better suited for the Neighborhood Revitalization Program;

- Projects in central business districts or commercial areas addressing deficiencies with multiple infrastructure-components;
- Projects which include road resurfacing, chip seal or other maintenance activities;
- Projects that are designed primarily for future residential, commercial or industrial development; and
- Large scale, single-purpose water and sanitary sewer projects with a total project cost in excess of \$600,000, or that require on-site improvements, and that are better suited for the CDBG Residential Public Infrastructure Program. Applicants must contact the OCD for guidance on program selection prior to submitting a letter of interest for water or sanitary sewer projects with a total project cost in excess of \$600,000.

State Agency Coordination: Projects including funding from the ODOT must be bid, contracted, and administered by the local government awarded CDBG funds. The OCD will not consider CDBG funding as match for an ODOT-administered project, unless the CDBG activity functions as a stand-alone project with independent bidding, contracting and completion timelines or prior written approval of the local government's ODOT participation agreement

Program Investment Area: Applicants must submit a map of the proposed service area indicating the proposed project's location and geographic area in which the primary residents reside. Applicants are expected to explain how the service area and project beneficiaries were determined. Communities will be required to complete a Critical Infrastructure Condition Certification to catalog the existing condition of the targeted infrastructure or facility, the impact the current condition has on residents of the service area, and the degree to which the proposed Critical Infrastructure program will improve the identified conditions.

Local Program Benefit/National Objective: Communities must qualify infrastructure activities under the HUD Ohio State Administered CDBG program national objectives of LMI area-wide benefit or the prevention/elimination of slum or blight on an area basis. Public facilities may qualify under the spot slum and blight national objective.

To qualify under the HUD National Objective of LMI area-wide benefit, residents in the designated geographic area must be at least 51% LMI. Applicants may use ACS data to document 51% LMI population.

The grantee may also qualify a project based on an income survey of the project's benefit (or service) area (completed according to the OCD Survey Methodology) which shows that at least 51% of the activity beneficiaries will be low- or moderate-income. The OCD Survey Methodology is included in the OCD Policy Notice 19-02, Qualifying Community Development and Residential Public Infrastructure Projects using Community Development Block Grant National Objectives, which provides guidance on meeting the LMI National Objective. **The grantee is required to submit appropriate survey information to the state at the time of application, including the income surveys collected to support the LMI data.**

The OCD may require an applicant to conduct an income survey to qualify a project for program funding if ACS data does not appear to adequately represent the **LMI proportion** of the service area. Applicants are **not** permitted to combine ACS data and data from an income survey to qualify a service area.

To qualify under the HUD National Objective of prevention/elimination of slum or blight, the designated geographic area must meet the state or local legal definition of substantial blighted or deteriorated public infrastructure elements. For the purposes of this definition, substantial is defined as at least 51% of the infrastructure within the defined service area is deteriorated.

Note: Reconstructing or improving public infrastructure that does not qualify as area benefit is not eligible under slum and blight unless located in a designated Central Business District.

Communities qualifying a project under the “elimination of slum or blight” national objective are required to submit either a statement signed by the applicant community’s Chief Executive Officer (CEO) or a resolution passed by the governing legislative body that declares the area slum or blighted and/or deteriorated or deteriorating, based upon state or local law. This statement or resolution must detail the program target area’s infrastructure conditions at the time of its designation (i.e., infrastructure surveys must have been conducted or updated within the 12-month period immediately prior to application submission to the OCD to document the appropriate designation). Also, a map, identifying the boundaries of both the target area identified in the local designation defined as slum or blighted and the proposed program target area, must be provided to the OCD with the statement or resolution. All survey information relative to the identified area(s) must be maintained by the program applicant and submitted as part of the program application process.

Public facilities may qualify under the spot slum and blight national objective. Applicants are required to submit a Building Conditions Survey – Single Building and Spot Slum and Blight Certification.

Communities are advised to seek technical assistance from the OCD prior to the application submission deadline.

Administration: A maximum of \$30,000 or 10% of the total CDBG project cost, whichever is less, may be used for general administration, environmental review, audit and close-out.

Expenditure of CDBG funds: The CDBG grant funds must be expended on a pro-rata basis with the other public and private funds committed at the time of application and described in Attachment A of the grant agreement. Any Allocation funds committed to the Critical Infrastructure project may be expended in full and are not subject to the pro-rata requirement. The grantee must keep appropriate documentation of these expenditures on file to demonstrate compliance.

Program Amendments: Because of the project-specific nature of the application and grant award, Critical Infrastructure Program grantees are discouraged from changing their programs. The OCD will consider on a case-by-case basis only those minor changes that do not affect the approved application’s competitiveness. Grantees considering a change in program scope, location or design, number and type of beneficiaries or anticipated accomplishments, must notify the OCD in writing of the proposed changes. Formal written OCD approval is required before making the changes. The OCD Amendment Policy is outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy.

Local Program Period: Allocation Program recipients awarded Critical Infrastructure funds on September 1, 2020, must complete their programs according to the following deadlines:

- 1) all activities (except audit and balance of administration) must be completed by the end of the 24th month;
- 2) all drawdown requests must be submitted to the OCD by the end of the 25th month; and
- 3) all funds must be disbursed and expended, and a final performance report must be submitted by the end of the 26th month.

Grant audit(s) must be conducted in accordance with 2 CFR 200, described in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

The OCD will start accepting letters of interest May 1, 2020. The letter of interest form is available on the OCD’s Technical Assistance website. The OCD will initiate the full application in OCEAN and notify the community of its availability when a letter of interest is accepted. Full applications will be accepted on an open-cycle basis from June 1, 2020, until April 30, 2021, or until such time the OCD expends available funding. The OCD will review applications in rounds designated by funding availability.

For projects to be considered during the first review period, applications must be submitted by June 17, 2020. Communities committing PY 2020 Allocation Program funds to a Critical Infrastructure project must submit both applications by the June 17, 2020 deadline.

Round One Program Period:

Submission: June 17, 2020

Grant Award: September 1, 2020

Grantees committing PY 2020 Allocation Program grant funds to a Round One Critical Infrastructure project must reprogram the Allocation funds to other CDBG- eligible activities if the Critical Infrastructure application is not approved by September 1, 2020.

Round Two Program Period:

Submission: To Be Determined

Grant Award: To Be Determined

Round Three Program Period:

Submission: To Be Determined

Grant Award: To Be Determined

Communities may not commit PY 2020 or PY 2021 Allocation Program grant funds to a Round Two or Round Three Critical Infrastructure project.

Application Review: Applications must be submitted through OCEAN, the OCD's web-based grants management system. The OCD will conduct up to three (3) funding rounds annually, funding permitting, and notify the community of funding decisions. Communities are required to hold two public hearings before submitting a complete application to the state. The general public hearing may count as the first public hearing if the hearing includes information on the CDBG Critical Infrastructure Program.

Critical Infrastructure applications not approved for funding will either be denied or returned for revision. Applicants will be informed of the OCD's decision in writing. Communities with applications returned for revision are strongly encouraged to consult the OCD for technical assistance prior to resubmission. If an application is returned for revision more than once, the community will be required to conduct an in-person technical assistance meeting with the OCD prior to resubmission.

Applications that meet threshold requirements, but are not funded, may also be resubmitted during the next evaluation period.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to submitting a funding application to the state for assistance with local match. The OCD reserves the right to reduce the grant award for successful applicants with Revolving Loan Fund balances.

Rating System Principles:

A Critical Infrastructure Program application must meet minimum program thresholds and eligibility criteria. The Critical Infrastructure Program pre-application will allow the OCD to determine the proposed project's feasibility and fundability. **Meeting minimum threshold requirements does not guarantee project funding.**

Program thresholds include the following:

- 1) **Leverage:** A minimum equal to 10% of the CDBG request must be leveraged from other public (e.g. Allocation, Revolving Loan Fund, local funds) and/or private sources.
- 2) **Program Impact:** The application must identify the critical need of the project as well as provide documentation regarding the system's failure and the impact on residents of the service area. The OCD will only consider projects for infrastructure that is in critical or poor condition in accordance with the following scale:

- 3) Readiness to Proceed: Project design must be completed prior to application submission. Applicants submitting projects requiring Ohio Environmental Protection Agency (OEPA) review must submit documentation of approval and/or the Permit to Install with the application.

Critical: Infrastructure has failed or there is an imminent threat of failure, and/or infrastructure has a documented health hazard. A state agency has issued one or more findings, recommendations or standards for continued operation.

Poor: Condition of infrastructure's remaining useful life is under five years of service and/or a state agency has requirements for continued operation. A health hazard could arise should current conditions not be addressed.

Fair: Condition of infrastructure's remaining useful life is estimated between five and 10 years of service. There is no documented health hazard.

Good: Condition of infrastructure's remaining useful life is more than 10 years of service. There is no documented health hazard.

Projects that meet the minimum threshold will be rated additional points based on criteria further identifying the critical nature of the application (e.g. failure level of the infrastructure system), impact (e.g. impact on identified beneficiaries, whether proposed solution meets the identified need, useful life of proposed improvements), and distress (e.g. LMI percent of the service area, LMI percent of the infrastructure owner) in accordance with the following point distribution:

- 1) **Distress (10 points):** Distress points will be calculated based on the LMI percent of the service area and the LMI percent of the community responsible for maintaining the project infrastructure.
- 2) **Implementation and Administrative Capacity (15 Points):** The applicant community's and identified administrator's capacity to carry out federal, state, and programmatic requirements will be taken into consideration. Administrative capacity will include experience in administering the following aspects of OCD administered programs: complying with the grant agreement(s); adhering to program regulations and policies; resolving monitoring and/or audit findings; and progress in completing activities. The applicant community's historical performance and the progress of other projects currently funded with OCD-administered funds will also be considered. Accuracy in budgets per activity and total project costs will be measured.
- 3) **Program Design (75 points):** Program design points will be calculated based on the project's criticality as demonstrated by the application narrative, photographs, Critical Infrastructure Condition Certification and additional supporting documentation. Points will also be awarded based on the impact the infrastructure's current condition has on the identified beneficiaries and the number of individuals expected to benefit from the project, and proportion of population to the surrounding place data (e.g. city, village, township). Also, included are useful life and appropriateness of the proposed project to meet the critical need identified. Prioritization of projects through the grantee's Community Development Implementation Strategy or other planning efforts may be considered.

Economic Development Loan and Public Infrastructure Grant Program

Total Funds: Approximately \$10 million in federal Community Development Block Grant (CDBG) funds.

Program Categories: Eligible applicants may submit applications for one or more of the following categories of funding: Economic Development Public Infrastructure Program, Economic Development Working Capital Loan Program, Economic Development Loan Program and/or Residential Public Infrastructure Program.

Local Program Benefit/National Objective: Communities **must** qualify activities under the HUD CDBG program national objective of LMI job creation. Please refer to OCD Policy Notice 19-04, Job Creation Requirements for Community Development Block Grant Economic Development and Revolving Loan Fund Programs, for additional guidance.

Application Submission: Applicants are required to submit a pre-application to the OCD for review to apply for funds. The OCD will evaluate the proposed project's pre-application on consistency with programmatic thresholds and public benefit before determining whether to invite applicants to submit a full application.

Pre-application instructions will be available on the OCD's technical assistance website. Applications will be accepted on an open-cycle basis starting July 1, 2020, until all PY 2020 funds are awarded.

Applicants must select either the Economic Development Loan Program or the Economic Development Public Infrastructure Grant Program. Applications may not request program funds for both activities. Applicants may include leveraged funds, including CDBG Economic Development Revolving Loan Funds, to fund both activities.

Economic Development Loan Program

Goal: To create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through expanding and retaining business and industry in Ohio communities.

Grant Ceiling. Maximum of \$500,000 for direct loans; maximum grant ceiling includes project and program administration costs. The OCD will evaluate the community's request during application review and reserves the right to reduce the award.

Eligible Jurisdictions: Non-entitlement cities and counties. Counties must apply on behalf of villages and townships; counties may also apply on behalf of cities within their jurisdiction. To limit creating new Revolving Loan Funds or in considering an applicant's administrative capacity, the OCD maintains the right to require counties to apply on behalf of cities when appropriate.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to submitting a funding application to the state for a specific economic development project.

Eligible Activities: Eligible activities include providing financial assistance to private for-profit entities (through eligible units of general local government) to carry out economic development projects directly and primarily related to creating, expanding or retaining a business. Financing under the state CDBG Economic Development Program may cover fixed assets, including land, building, machinery and equipment and site preparation directly related to business or industrial development. The amount and type of financial assistance provided to a project must be deemed appropriate with respect to the financial gap and the public benefit to be derived. Financing for fixed assets must be provided in the form of a non-forgivable loan.

In addition, job training is an eligible CDBG Economic Development Program activity. The state may provide applicants up to an additional \$50,000 in Economic Development Program funds to provide training for low- and moderate-income individuals whose positions were created or retained by the recipient business.

Ineligible Activities:

- Financing existing debt, working capital, non-capital equipment and inventory;
- Financing a project that involves relocating an industry or business from one area of Ohio to another. Exceptions will be made by the state on a case-by-case basis, but only if the relocation will create additional jobs, and the industry or business furnishes information to the state which demonstrates that the industry or business could not continue to operate in the existing location. Also, the applicant community must send a letter (by certified mail) to the community from which the business is relocating, explaining the reasons for relocation. The letter must include the OCD's address and identify the OCD Economic Development Coordinator as the contact person; and
- Financing speculative projects or buildings. Speculative buildings include those that do not have tenant commitments for more than 50% of the floor space or where project resources may not be sufficient to cover expenses.

Prohibition on Assistance for Job-Pirating Activities: CDBG regulations prohibit providing assistance that will result in relocating a plant, facility or operation from one Labor Market Area to another, as defined by the OCD, within three years of the assistance date, if such relocation will likely result in a significant job loss in the labor market area from which the relocation occurs. A significant loss is defined as losing 500 or more jobs, or 1/10th of 1% of the total labor force in the labor market area through job relocation; but in all circumstances, 25 or fewer jobs will not be considered a significant loss. Federal Register/Vol. 71, No. 100/May 24, 2006/Rules and Regulations/24 CFR Part 570/Prohibition on Use of Community Development Block Grant Assistance for Job-Pirating Activities. (Map 1 shows the OCD-defined labor market areas.)

Application Timing: Project applications will be accepted on a continuous basis, beginning July 1, 2020.

Application Review: Applications must be submitted through OCEAN, the OCD's web-based grants management system. The OCD will provide access to the applicant community in OCEAN after the pre-application is submitted and reviewed. The OCD will review the application and provide a written response to the applicant community within 30 days of submission. A funding decision will be made within 45 days of receiving a complete application. **Communities are required to hold two public hearings before submitting a complete application to the state. The CDBG general public hearing may count as the first public hearing if the hearing includes information on the Economic Development Program.** Communities are also required to include a discussion of the Economic Development Program and identify economic development needs as a component of the biennial Community Development Implementation Strategy.

Administrative Costs: Units of general local government receiving grants for economic development projects shall be allowed a maximum of \$20,000, not to exceed 10% of the project request, for general administration and implementation. Counties applying on behalf of other jurisdictions are limited to the same ceiling on administrative costs. For projects in which the \$500,000 maximum is requested, administration funds must be subtracted from the total project award. Applicants requesting substantially less than the full amount allowed will receive special consideration.

Repayment/Program Income: Under the PY 2020 Ohio State-Administered CDBG Program, funds awarded to units of general local government for economic development projects, and any subsequent program income generated, may not need to be repaid to the state of Ohio, if all funds are expended by the grantee in the same manner as the activity (economic development) that generated the program income, provided that the local grantee has an existing and satisfactorily performing economic development Revolving Loan Fund. Funds that will be expended in a different manner must receive prior approval from the state. The state reserves the right to recapture local program income from communities that fail to adequately meet statutory and regulatory requirements. Any program income derived by the grantee through administering economic development funds must also be expended according to applicable federal and state statutory and regulatory requirements. Smaller units of government that do not have an ongoing grant relationship with the OCD, or an existing Revolving Loan Fund, will be required to arrange Revolving Loan Fund agreements with their county.

The OCD will evaluate the grantee's ability to effectively administer a local Revolving Loan Fund upon application approval. If it is determined that the local Revolving Loan Fund is not being satisfactorily administered, collateral effectuation, promissory notes and loan repayments must be provided to the State. A determination on what constitutes a "satisfactorily administered" economic development Revolving Loan Fund is the sole discretion of the state.

Closing Binder: An executed Closing Binder, comprised of all documents showing that the project is ready to move forward and legal agreements between the awarded local government and beneficiary business, must be received and acknowledged by the OCD before drawing or expending CDBG funds.

Number of Grant Awards: A project (site specific) may receive one award up to a maximum of \$500,000 in a program year. No business may receive additional CDBG assistance until it completes its open CDBG project, in compliance with all requirements, and created/retained all the jobs to which the business committed. In addition, the prior grant must have been monitored and closed prior to considering an additional request.

Local Program Benefit: At least 51% of the jobs created and/or retained must be taken by, or made available to, low- and moderate-income persons, as defined by the CDBG program. Job creation attributable to the CDBG-supported project must take place within 24 months of the work completion date as specified in the Grant Agreement.

If 51% of the jobs created and/or retained are not taken by low- and moderate-income persons, the business must document that at least 51% of the jobs created and/or retained were made available to LMI persons.

Please refer to OCD Policy Notice 19-04, Job Creation Requirements for Community Development Block Grant Economic Development and Revolving Loan Fund Programs, for specific guidance on how to document job creation and job availability for low- and moderate-income persons.

Job Documentation: The business may utilize the Ohio Department of Job and Family Services (ODJFS) and obtain a certification from that agency that a minimum of 51% of the jobs created were for persons of low- and moderate-income households. If ODJFS is not utilized, the business must maintain the following data on each employee hired or retained and each individual interviewed for a job:

- 1) Person's name;
- 2) Number of individuals in person's family; and
- 3) Total family income of the person being interviewed (this should be done as an over/below answer relating to the median family income for each family size)

If an employee resides or is employed in a census tract where 70% or more residents have incomes at or below 80% of the Area Median Income, the employee is presumed to be a LMI person. Such a presumption can also be made if an employee lives in a census tract or block group where 20% or more of the residents are below the poverty level, or if the assisted business and the job under consideration are in a census tract or block group where 20% or more of the residents are below the poverty level. The same census tract criteria would apply to employees living in or employed in a federal empowerment zone or enterprise community. The maps identifying eligible block groups and census tracts can be found at the following links [Block Groups](#) and [Census Tracts](#).

This information, in either form, must be available in the community's program file as proof that the CDBG national objective was met.

Program Amendments: Because grant awards are based on the project proposed in the application, Economic Development Program grantees are discouraged from changing their approved programs. The OCD will consider, on a case-by-case basis, only those changes that do not negatively impact the approved application's original scoring. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments or grant agreement deadline, must notify the OCD in writing of the proposed changes. Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is

outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures. The OCD will consider amendment requests in application scoring during future funding rounds.

Local Program Period: Economic Development grantees will be allowed up to 14 months to have PY 2020 grant(s) ready for closeout, beginning with grant agreement execution date. Within this allowable program period, the following deadlines must be met:

- 1) all activities must be completed by the end of the 12th month;
- 2) all funds must be drawn down by the end of the 13th month; and
- 3) all funds must be expended, the final performance report must be submitted, and the local program must be ready to be closed out by the end of the 14th month.

Grant audit(s) must be conducted in accordance with 2 CFR 200, as described in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

If a project will not be completed within the time frame identified above, an alternative local program period must be requested when applying and approved prior to project commencement.

Appropriate Analysis: Under the Economic Development Loan Program, assistance is provided to private, for-profit businesses for eligible activities, where the assistance is appropriate to carry out an economic development project. To ensure that any such assistance is not unreasonably high, the state will conduct an analysis to determine that the amount of any financial assistance to be provided is not excessive, considering the business' actual needs in making the project financially feasible and the public benefit expected from the project.

Rating System Principles: An Economic Development Loan Program application must meet minimum program thresholds and eligibility criteria. The Economic Development Loan Program application will allow the OCD to determine a proposed project's feasibility and fundability. **Meeting minimum threshold requirements does not guarantee project funding.**

Program thresholds include the following:

- 1) A project must create and/or retain at least five full-time, permanent jobs in the private sector;
- 2) At least 51% of the full-time, permanent jobs created and/or retained must be taken by or made available to persons from low- and moderate-income households;
- 3) The CDBG cost per job must not exceed \$25,000; however, to be competitive, an applicant must keep the CDBG cost-per-job ratio as low as possible;
- 4) Each CDBG dollar must leverage at least one dollar of other public or private investment in the project's fixed asset cost;
- 5) To be eligible for a CDBG loan, a borrower must be prepared to devote cash equity to the project's fixed assets equal to at least 5% of the total project's non-infrastructure fixed asset cost. Prior to the OCD approving the loan, the borrower must demonstrate sufficient cash on hand to meet this qualification; borrowed or otherwise previously expended cash does not meet this qualification; and
- 6) At least 15% of a project's fixed asset cost must be privately financed; this may include owner/developer's cash equity contribution.

The OCD will assess the application to determine whether the funding being requested is appropriate to meet federal and state economic development objectives. The following rating criteria will be used to evaluate project applications:

- 1) **Program Effectiveness (60 points):** Cost per job, job quality, CDBG funds re-capture terms, credit analysis, leverage ratio and equity contribution percentage.

- 2) Program Impact (24 points): Downtown location, vacant building use, coordinating with other public programs, extensive spin-off potential, significant community impact and public benefit, using Ohio made products/materials, export business, project compatibility with statewide or local development plans, new enterprise, high low- and moderate-income person job commitment, Appalachian area location, low percentage of awarded administrative funds.
- 3) Distress (16 points): Unemployment rate according to the latest monthly report and the percent of low- and moderate-income population in the county, and as compared to the State of Ohio.

Economic Development Working Capital Loan Program

Goal: To provide working capital on a community-wide basis for COVID19-impacted businesses. Projects must create and retain permanent, private-sector jobs, principally for low- and moderate-income persons, through retaining business and industry in Ohio communities.

Grant Ceiling. Maximum of \$150,000 for direct loans; maximum grant ceiling includes project costs only. The OCD will evaluate the community's request during application review and reserves the right to reduce the award.

Eligible Jurisdictions: Non-entitlement cities and counties. Counties must apply on behalf of villages and townships; counties may also apply on behalf of cities within their jurisdiction. To limit creating new Revolving Loan Funds or in considering an applicant's administrative capacity, the OCD maintains the right to require counties to apply on behalf of cities when appropriate.

Revolving Loan Fund Participation: Local units of government will be required to disburse all existing Economic Development Revolving Loan Funds prior to or in conjunction with submitting a funding application to the state.

Eligible Activities: Eligible activities include providing financial assistance to private for-profit entities (through eligible units of general local government) to carry out economic development projects directly and primarily related to retaining a business. Financing under the state CDBG Economic Development Working Capital Loan Program may cover payroll costs and monthly expenses, including payments on rent, mortgage, utilities, inventory, and other recurring monthly expenses deemed integral to the business. The amount and type of financial assistance provided to a project must be deemed appropriate with respect to the financial gap and the public benefit to be derived. Financing for working capital must be provided in the form of a non-forgivable loan with a maximum 5-year term. Businesses must certify that working capital funds are not available from other public or private entities to qualify for assistance. The applicant's Revolving Loan Fund Board will determine interest rates, loan terms, and security requirements. Principal and interest payments may be deferred for 6 months with a 6-month option to renew.

Ineligible Activities:

- Refinancing existing debt
- Financing a project suitable for the Economic Development Loan Program, where the primary goal is to provide gap financing for fixed assets
- Financing a project that involves relocating an industry or business from one area of Ohio to another. Exceptions will be made by the state on a case-by-case basis, but only if the relocation will create additional jobs, and the industry or business furnishes information to the state which demonstrates that the industry or business could not continue to operate in the existing location. Also, the applicant community must send a letter (by certified mail) to the community from which the business is relocating, explaining the reasons for relocation. The letter must include the OCD's address and identify the OCD Economic Development Coordinator as the contact person.
- Financing speculative projects or buildings. Speculative buildings include those that do not have tenant commitments for more than 50 percent of the floor space or where project resources may not be sufficient to cover expenses.

- Community administrative costs

Prohibition on Assistance for Job-Pirating Activities: CDBG regulations prohibit providing assistance that will result in relocating a plant, facility or operation from one Labor Market Area to another, as defined by the OCD, within three years of the assistance date, if such relocation will likely result in a significant job loss in the labor market area from which the relocation occurs. A significant loss is defined as losing 500 or more jobs, or 1/10th of one percent of the total labor force in the labor market area through job relocation; but in all circumstances, 25 or fewer jobs will not be considered a significant loss. Federal Register/Vol. 71, No. 100/May 24, 2006/Rules and Regulations/24 CFR Part 570/Prohibition on Use of Community Development Block Grant Assistance for Job-Pirating Activities. (Map 1 shows the OCD-defined labor market areas.)

Application Timing: Project applications will be accepted on a continuous basis, beginning July 1, 2020.

Application Review: Applications must be submitted through OCEAN, the OCD's web-based grants management system. The OCD will provide access to the applicant community in OCEAN after the pre-application is submitted and reviewed. The OCD will review the application and provide a written response to the applicant community within 15 days of submission. A funding decision will be made within 15 days of receiving a complete application. **Communities are required to hold two public hearings before submitting a complete application to the state. The CDBG general public hearing may count as the first public hearing if the hearing includes information on the Economic Development Program.**

Administrative Costs: Units of general local government receiving grants for Economic Development Working Capital Loan Program projects shall not use grant funds for general administration and implementation. Applicants may use existing Revolving Loan Fund dollars for administration if included in an approved application.

Repayment/Program Income: Under the PY 2020 Ohio State-Administered CDBG Program, funds awarded to units of general local government for economic development projects, and any subsequent program income generated, may not need to be repaid to the state of Ohio, if all funds are expended by the grantee in the same manner as the activity (economic development) that generated the program income, provided that the local grantee has an existing and satisfactorily performing economic development Revolving Loan Fund. Funds that will be expended in a different manner must receive prior approval from the state. The state reserves the right to recapture local program income from communities that fail to adequately meet statutory and regulatory requirements. Any program income derived by the grantee through administering economic development funds must also be expended according to applicable federal and state statutory and regulatory requirements. Smaller units of government that do not have an ongoing grant relationship with the OCD, or an existing Revolving Loan Fund, will be required to arrange Revolving Loan Fund agreements with their county.

The OCD will evaluate the grantee's ability to effectively administer a local Revolving Loan Fund upon application approval. If it is determined that the local Revolving Loan Fund is not being satisfactorily administered, collateral effectuation, promissory notes and loan repayments must be provided to the State. A determination on what constitutes a "satisfactorily administered" economic development Revolving Loan Fund is the sole discretion of the state.

Closing Binder: An executed Closing Binder, including a loan agreement, low- and moderate-income (LMI) job commitments, and Revolving Loan Fund Board and local legal counsel approval, must be received and acknowledged by the OCD before drawing or expending CDBG funds.

Number of Grant Awards: A community may receive one award up to a maximum of \$150,000 in a program year. A community may apply to receive additional CDBG assistance upon disbursing all awarded funds to eligible businesses in compliance with all requirements.

Local Program Benefit: At least 51 percent of the jobs created and/or retained must be taken by, or made available to, low- and moderate-income persons, as defined by the CDBG program. Job creation attributable to the CDBG-supported project must take place within 12 months of the working capital loan disbursement.

If 51 percent of the jobs created and/or retained are not taken by low- and moderate-income persons, the business must document that at least 51 percent of the jobs created and/or retained were made available to low- and moderate-income persons. Please refer to **OCD Policy Notice 19-01: Job Creation Requirements for Community Development Block Grant Economic Development and Revolving Loan Fund Programs** for specific guidance on how to document job creation and job availability for low- and moderate-income persons.

Job Documentation: The business may utilize the Ohio Department of Job and Family Services (ODJFS) and obtain a certification from that agency that a minimum of 51 percent of the jobs created were for persons of low- and moderate-income households. **If ODJFS is not utilized, the business must maintain the following data on each employee hired or retained and each individual interviewed for a job:**

- 4) Person's name
- 5) Number of individuals in person's family
- 6) Total family income of the person being interviewed (this should be done as an over/below answer relating to the median family income for each family size)

If an employee resides or is employed in a census tract where 70 percent or more residents have incomes at or below 80 percent of the Area Median Income, the employee is presumed to be a low- and moderate-income person. Such a presumption can also be made if an employee lives in a census tract or block group where 20 percent or more of the residents are below the poverty level, or if the assisted business and the job under consideration are in a census tract or block group where 20 percent or more of the residents are below the poverty level. The same census tract criteria would apply to employees living in or employed in a federal empowerment zone or enterprise community. Map 3 shows Qualifying Census Tracts.

Maps of jurisdictions qualifying as presumed benefit areas may be found on the [Economic Development Poverty and LMI Maps page](#) on OCD's Technical Assistance site.

This information, in either form, must be available in the community's program file to evidence the CDBG national objective was met.

Program Amendments: Because grant awards are based on the project proposed in the application, Economic Development Program grantees are discouraged from changing their approved programs. The OCD will consider, on a case-by-case basis, only those changes that do not negatively impact the approved application's original review. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments or grant agreement deadline, must notify the OCD in writing of the proposed changes. Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is outlined in **Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures**. The OCD will consider amendment requests in application scoring during future funding rounds.

Local Program Period: Economic Development grantees will be allowed up to 14 months to have PY 2020 grant(s) ready for closeout, beginning with grant agreement execution date. Within this allowable program period, the following deadlines must be met:

- 4) all activities must be completed by the end of the 12th month;
- 5) all funds must be drawn down by the end of the 13th month; and
- 6) all funds must be expended, the final performance report must be submitted, and the local program must be ready to be closed out by the end of the 14th month.

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**.

If a project will not be completed within the time frame identified above, an alternative local program period must be requested when applying and approved prior to project commencement.

Appropriate Analysis: Under the Economic Development Loan Program, assistance is provided to private, for-profit businesses for eligible activities, where the assistance is appropriate to carry out an economic development project. To ensure that any such assistance is not unreasonably high, the state will conduct an analysis to determine that the amount of any financial assistance to be provided is not excessive, considering the business' actual needs in making the project financially feasible and the public benefit expected from the project.

Rating System Principles: An Economic Development Working Capital Loan Program application must meet minimum program thresholds and eligibility criteria. The Economic Development Loan Program application will allow the OCD to determine a proposed project's feasibility and fundability. **Meeting minimum threshold requirements does not guarantee project funding.**

Program thresholds include the following:

- A project must create and/or retain at least one full-time, permanent job in the private sector;
- At least 51 percent of the full-time, permanent jobs created and/or retained must be taken by or made available to persons from low- and moderate-income households;
- The CDBG cost per job must not exceed \$5,000;
- The maximum loan per private for-profit entity must not exceed \$25,000

Economic Development Public Infrastructure Grant Program

Goal: To create and retain permanent, private-sector job opportunities, principally for low- and moderate-income persons, through expanding and retaining business and industry in Ohio communities.

Grant Ceiling. Maximum of \$500,000 for off-site infrastructure projects; maximum grant ceiling includes project and program administration costs. The OCD will evaluate the community's request during application review and reserves the right to reduce the award.

Eligible Jurisdictions: Non-entitlement cities and counties. Counties must apply on behalf of villages and townships; counties may also apply on behalf of cities within their jurisdiction. In considering an applicant's administrative capacity, the OCD maintains the right to require counties to apply on behalf of cities when appropriate.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with, or prior to, submitting a funding application to the state for a specific economic development project.

Eligible Activities: Eligible activities include providing financial assistance, through eligible units of general local government, for public improvements directly and primarily related to creating, expanding or retaining a particular business. Financing under the State CDBG Economic Development Public Infrastructure Program is designed to cover public infrastructure investment directly related to business or industrial development. The amount and type of financial assistance provided to a project must be deemed appropriate with respect to financial gap and public benefit.

In addition, job training is an eligible CDBG Economic Development Program activity. The state may provide applicants up to an additional \$50,000 in Economic Development Program funds to provide training for low- and moderate-income individuals whose positions were created or retained by the recipient business.

Ineligible Activities:

- Financing a project that involves relocating an industry or business from one area of Ohio to another. Exceptions will be made by the state on a case-by-case basis, but only if the relocation will create

additional jobs, and the industry or business furnishes information to the state which demonstrates that the industry or business could not continue to operate in the existing location. Also, the applicant community must send a letter (by certified mail) to the community from which the business is relocating, explaining the reasons for relocation. The letter must include the OCD's address and identify the OCD Economic Development Coordinator as the contact person.

- Financing speculative projects. Speculative projects include those that do not have an identified business or industrial development committed to private investment and job creation as an end user for the public infrastructure or where project resources may not be sufficient to cover expenses.
- Financing site preparation or infrastructure improvements owned by an identified business or industrial development or on an identified business' or industrial development's site. Site preparation and on-site infrastructure improvements are eligible CDBG Economic Development Loan Program activities.
- Area-wide infrastructure projects in a community's defined central business district will not be funded under the Economic Development Public Infrastructure Grant Program. The Community Development Programs are available funding sources for downtown-related infrastructure projects.

Prohibition on Assistance for Job-Pirating Activities: CDBG regulations prohibit providing assistance that will result in relocating a plant, facility or operation from one Labor Market Area to another, as defined by the OCD, within three years of the assistance date, if such relocation will likely result in a significant job loss in the labor market area from which the relocation occurs. A significant loss is defined as losing 500 or more jobs or 1/10th of 1% of the total labor force in the labor market area through relocating jobs, but in all circumstances, 25 or fewer jobs will not be considered a significant loss. Federal Register/Vol. 71, No. 100/May 24, 2006/Rules and Regulations/24 CFR Part 570/Prohibition on Use of Community Development Block Grant Assistance for Job-Pirating Activities. (Map 1 shows the OCD-defined labor market areas.)

Off-Site Infrastructure Activities: While infrastructure is an eligible activity, the applicant community must demonstrate need for the funding level requested. Infrastructure funding will be based on the following guidelines:

- 1) If the infrastructure improvement is on-site, funding must be provided to the business as a loan. Such projects will be considered with an application to the CDBG Economic Development Loan Program.
- 2) The OCD will require community, business and/or other financial participation toward the infrastructure costs. CDBG can only fund a portion of the minimum infrastructure necessary to adequately serve the business. In addition, applicants are reminded that CDBG funds can be used as either loans or grants. The department encourages communities to utilize negotiating methods and thorough discussion which, if appropriate, may result in a partial payback of CDBG funds to the community for future CDBG eligible activities. Such practice is not required and will not impact the department's decision in awarding CDBG funds. Any payments made to the community because of infrastructure repayment negotiations are maintained by the community in its Revolving Loan Fund as a revenue source to pay for infrastructure or other eligible projects in the future.
- 3) CDBG economic development funding for the off-site infrastructure portion of projects will be scaled according to local area distress, as follows:
 - Counties that are not distressed may receive up to 50% of the total off-site infrastructure costs.
 - Counties that are distressed may receive up to 60% of the total off-site infrastructure costs.
 - Counties that are highly distressed may receive up to 75% of the total off-site infrastructure costs.

Note: For the purpose of this program, distressed areas in the state are determined by Development's Research Office, based on unemployment rate, per capita income, poverty and Appalachian Regional Commission distress criteria (see Map 2).

Application Timing: Project applications will be accepted on a continuous basis, beginning on July 1, 2020.

Application Review: Applications must be submitted through OCEAN, the OCD's web-based grants management system. The OCD will provide access to the applicant community in OCEAN after the pre-application is submitted and reviewed. The OCD will review the application and provide a written response to the applicant community within 30 days of submission. A funding decision will be made within 45 days after the OCD receives the complete application. **Communities are required to hold two public hearings before submitting a complete application to the state. The CDBG general public hearing may count as the first public hearing if the hearing includes information on the Economic Development Public Infrastructure Grant Program.** Communities are also required to include a discussion of the Economic Development Program and identify economic development needs as a component of the biennial Community Development Implementation Strategy

Administrative Costs: Units of general local government receiving grants for economic development projects shall be allowed a maximum of \$20,000, not to exceed 10% of the project request, for general administration and implementation. The OCD will evaluate the community's request during application review and reserves the right to reduce the award. Counties applying on behalf of other jurisdictions are limited to the same ceiling on administrative costs. For applicants requesting the \$500,000 maximum award, administration funds must be subtracted from the total project award. Applicants requesting substantially less than the full amount allowed will receive special consideration.

Repayment/Program Income: Under the PY 2020 Ohio State Administered CDBG Program, funds awarded to units of general local government for economic development projects, and the subsequent program income which may be generated, may not need to be repaid to the state of Ohio, if all funds are expended by the grantee in the same manner as the activity (economic development) that generated the program income, provided that the local grantee has an existing and satisfactorily performing economic development Revolving Loan Fund. Funds expended in a different manner must receive prior approval from the state. The state reserves the right to recapture local program income from communities that fail to adequately meet statutory and regulatory requirements. Any program income derived by the grantee through administering economic development funds must also be expended according to applicable federal and state statutory and regulatory requirements. Smaller units of government that do not have an ongoing grant relationship with the OCD, or an existing Revolving Loan Fund, will be required to arrange Revolving Loan Fund agreements with their county.

The OCD will evaluate the grantee's ability to effectively administer a local Revolving Loan Fund when the application is approved. If it is determined that the local Revolving Loan Fund is not being satisfactorily administered, collateral effectuation, promissory notes and loan repayments must be provided to the state. A determination on what constitutes a "satisfactorily administered" economic development Revolving Loan Fund is the sole discretion of the state.

Closing Binder: An executed Closing Binder, comprised of all documents showing that the project is ready to move forward and legal agreements between the awarded local government and beneficiary business, must be received and acknowledged by the OCD before drawing or expending CDBG funds.

Expenditure of CDBG funds: The CDBG grant funds must be expended on a pro-rata basis with the other public and private funds committed for off-site infrastructure activities at the time of application and described in Attachment A of the grant agreement. The grantee must keep appropriate documentation of these expenditures on file to demonstrate compliance. When possible, fixed asset investment should be completed prior to commencing off-site infrastructure activities and disbursing CDBG funds. Guidance on how to comply with the pro-rata requirement is available in OCD Policy Notice 19-03, Pro-Rata Requirements for Office of Community Development Programs.

Number of Grant Awards: A project (site specific) may receive one award up to a maximum of \$500,000 in a program year. No business may benefit from additional CDBG assistance until the business has completed its most recent CDBG project, in compliance with all requirements, and created/retained all the jobs to which the business committed. In addition, the prior grant must have been monitored and closed prior to considering an additional request.

Local Program Benefit: At least 51% of the jobs created and/or retained must be made available to low- and moderate-income persons, as defined by the CDBG program. Job creation attributable to the CDBG-supported project must take place within 24 months of the work completion date as specified in the Grant Agreement.

If 51% of the jobs created and/or retained are not taken by LMI persons, the business must document that at least 51% of the jobs created and/or retained were made available to low- and moderate-income persons. Please refer to OCD Policy Notice 19-04, Job Creation Requirements for Community Development Block Grant Economic Development and Revolving Loan Fund Programs, for specific guidance on how to document job creation and job availability for low- and moderate-income persons.

Benefit Documentation for Public Improvements: The unit of local government receiving a CDBG public improvement award to create and/or retain jobs must prepare an assessment identifying any businesses located or expected to locate in the public improvement service area. The assessment must project all jobs that are expected to be created or retained for the one-year period after completing the public improvement. Jobs created by businesses that locate in the area because of the public improvement at any time during the three-year period are considered in meeting the 51% LMI benefit national objective. If, however, the amount of CDBG assistance provided for the public improvement in relation to the number of jobs projected to be created/retained, as identified in the assessment, is such that the amount per job does not exceed \$9,999, the jobs created by businesses not identified in the assessment do not need to be considered.

Job Documentation: The business may utilize the Ohio Department of Job and Family Services (ODJFS) to obtain a certification that a minimum of 51% of the jobs created were for persons of low- and moderate-income households. **If ODJFS is not utilized, the business must maintain the following data on each employee hired or retained and each individual interviewed for a job:**

- 1) Person's name;
- 2) Number of individuals in person's family; and
- 3) Total family income of the person being interviewed (this should be done as an over/below answer relating to the median family income for each family size)

If an employee resides or is employed in a census tract where 70% or more residents have incomes at or below 80% of the Area Median Income, the employee is presumed to be a LMI person. Such a presumption can also be made if an employee lives in a census tract or block group where 20% or more of the residents are below the poverty level, or if the assisted business and the job under consideration are in a census tract or block group where 20% or more of the residents are below the poverty level. The same census tract criteria would apply to employees living in or employed in a federal empowerment zone or enterprise community. The maps identifying eligible block groups and census tracts can be found at the following links [Block Groups](#) and [Census Tracts](#).

This information, in either form, must be available in the community's program file as proof that the CDBG national objective was met.

Program Amendments: Because grant awards are based on the project(s) proposed in the application, Economic Development Program grantees are discouraged from changing their approved programs. The OCD will consider, on a case-by-case basis, only those changes that do not negatively impact the approved application's original scoring. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments or grant agreement deadline, must notify the OCD in writing of the proposed changes. Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures. The OCD will consider amendment requests in application scoring during future funding rounds.

Local Program Period: Economic Development grantees will be allowed up to 14 months to have their PY 2020 grant(s) ready for closeout, beginning with the grant agreement execution date. Within this allowable program period, the following deadlines must be met:

- 1) all activities must be completed by the end of the 12th month;

- 2) all funds must be drawn down by the end of the 13th month; and
- 3) all funds must be expended, the final performance report must be submitted, and the local program must be ready to be closed out by the end of the 14th month.

Grant audit(s) must be conducted in accordance with 2 CFR 200, described in OCD Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

If a project will not be completed within the time frame identified above, an alternative local program period must be requested when applying and approved prior to project commencement.

Appropriate Analysis: Under the Economic Development Public Infrastructure Grant Program, assistance is provided to private, for-profit businesses for eligible activities, where the assistance is appropriate to carry out an economic development project. To ensure that any such assistance is not unreasonably high, the state will conduct an analysis to determine that the amount of any financial assistance to be provided is not excessive, considering the business' actual needs in making the project financially feasible and the public benefit expected from the project.

Rating System Principles: An Economic Development Public Infrastructure Grant Program application must meet minimum program thresholds and eligibility criteria. The Economic Development Public Infrastructure Grant Program application will allow the OCD to determine the proposed project's feasibility and fundability.

Meeting minimum threshold requirements does not guarantee project funding.

Program thresholds include the following:

- 1) A project must create and/or retain at least five full-time, permanent jobs in the private sector;
- 2) At least 51% of the full-time, permanent jobs created and/or retained must be taken by or made available to persons from low- and moderate-income households;
- 3) The CDBG cost per job must not exceed \$9,999 for off-site infrastructure projects; however, to be competitive, an applicant must keep the CDBG cost-per-job ratio as low as possible;
- 4) Each CDBG dollar must leverage at least one dollar in other public or private investment; and
- 5) At least 15% of a project's fixed asset cost must be privately financed; this may include owner/developer's cash equity contribution.

The OCD will assess the application to determine whether the funding being requested is appropriate to meet federal and state economic development objectives. The following rating criteria will be used to evaluate project applications:

- 1) **Program Effectiveness (60 points):** Cost per job, job quality, percentage of community contribution for infrastructure, credit analysis, leverage ratio and percentage of equity contribution.
- 2) **Program Impact (24 points):** Downtown location, vacant building use, coordinating with other public programs, extensive spin-off potential, significant community impact and public benefit, using Ohio made products/materials, export business, project compatibility with statewide or local development plans, new enterprise, high low- and moderate-income person job commitment, Appalachian area location low percentage of awarded administrative funds.
- 3) **Distress (16 points):** Unemployment rate according to the latest monthly report and the percent of low- and moderate-income population in the county, and as compared to the State of Ohio.

Residential Public Infrastructure Grant Program

Goal: To create a safe and sanitary living environment for Ohio citizens, by providing safe and reliable drinking water and proper sanitary waste disposal.

Grant Ceiling: Maximum of \$750,000; maximum grant ceiling includes a public water or sanitary sewer project, on-site improvements and program administration costs. On-site improvements are capped at \$200,000. Grantees will be allowed one amendment to move funds between public construction and on-site improvements as needed. A waiver is required from the OCD to exceed the \$200,000 on-site cap. The OCD will evaluate the community's entire request during application review and reserves the right to reduce the award.

Grant Floor: Minimum of \$100,000; minimum total project cost of \$200,000. The OCD will consider waivers to the grant floor on a case-by-case basis. Projects with a grant request of less than \$500,000 and a total project cost of less than \$600,000 may also be submitted under the Community Development Critical Infrastructure Program if on-site improvements are not required. The OCD will consider waivers to the grant floor on a case-by-case basis. Applicants must contact the OCD for guidance on program selection prior to submitting a letter of interest for water or sanitary sewer projects with a total project cost of less than \$600,000.

Eligible Jurisdictions: Non-entitlement counties, cities and villages. Counties must apply on behalf of unincorporated areas and villages that do not have a demonstrated capacity to operate a public water or wastewater system (see **Memorandum of Understanding policy** below). Cities and villages will be limited to one grant award per program year. Counties will be limited to four awards per program year. A county may receive two grant awards for applications submitted on behalf of itself and two on behalf of one or more eligible sub-units of general local government (villages and cities) within the county's jurisdiction. Jurisdictions funded under this program in PY 2019 will not be eligible for funding in PY 2020; however, counties funded in PY 2019 can apply on behalf of a different sub-unit of government within their jurisdiction. All applicants must be able to demonstrate that they can administer a Residential Public Infrastructure Grant Program. The OCD may require a county to apply for grant funds on the behalf of a city or village within its jurisdiction if administrative capacity cannot be demonstrated by the city or village.

Memorandum of Understanding: To facilitate constructing a project funded through the CDBG Residential Public Infrastructure Grant Program, a grantee may be permitted to enter into a Memorandum of Understanding (MOU) with a municipality, local water or sewer district and/or a nonprofit water company, so that it can implement the project. The municipality, local water or sewer district and/or a nonprofit water company must be the sole or part owner of a contract funded with CDBG dollars for constructing water or sanitary sewer facility improvements. A grantee must **notify OCD of its intention to enter into an MOU at the time of application**. The grantee will retain responsibility for assuring that the project meets all of the OCD's grant agreement conditions.

Local Capacity: Applicants must be able to demonstrate an ability to operate a water or wastewater system. Villages that currently lack both systems will not be considered to have capacity. Applicants must also document the proposed project's long-term financial viability by providing demographic trend data for the community, demonstrating funds are available to service debt and for long term system operations and maintenance, and complying with rate structure requirements.

Eligible Activities: The Residential Public Infrastructure Grant Program will only fund projects that provide water and/or sanitary sewer service to primarily residential users (minimum 60% of total users). Eligible on-site improvements include service laterals, septic tanks and well abandonment and CDBG-eligible related fees. Applications where the primary objective is funding on-site improvements will not be considered. Funding for water and/or sanitary sewer projects that benefit primarily commercial or industrial users are more appropriate for the Economic Development Program.

Administrative Cost: A maximum of 10% or \$30,000, whichever is less, of the total grant amount may be used for general administration, implementation (including on site delivery costs), environmental review, audit and close-out. The OCD will evaluate the community's request during application review and reserves the right

to reduce the award. Projects not requesting CDBG funds for household connections will be limited to a maximum of \$20,000 in administration.

Expenditure of CDBG funds: The CDBG grant funds awarded for public water or sanitary sewer improvements must be expended on a pro-rata basis with the other public and private funds committed at the time of application and described in Attachment A of the grant agreement. The pro-rata share will be adjusted if the OCD approves an amendment to move funds between public construction and on-site improvements. The grantee must keep appropriate documentation of these expenditures on file to demonstrate compliance.

Program Benefit Survey: The grantee may qualify a project using the 2011-2016 American Community Survey Low/Moderate Income Summary Data or an income survey of the activity's benefit area (service area) conducted in accordance with the OCD Survey Methodology showing that at least 51% of the activity beneficiaries are low- or moderate-income. The grantee is required to submit appropriate survey documentation with the application to the OCD. Policy Notice 19-02, Qualifying Community Development and Residential Public Infrastructure Projects using Community Development Block Grant National Objectives, provides guidance on meeting the LMI National Objective.

The OCD may require an applicant to conduct an income survey to qualify a project for program funding if ACS data does not appear to adequately represent the service area.

Applicants are not permitted to combine ACS data and data from an income survey to qualify a service area.

Program Amendments: Because grant awards are based on the projects proposed in the application, grantees receiving Residential Public Infrastructure Grant funds are discouraged from changing their approved projects. The OCD will consider, on a case-by-case basis, only those changes that do not negatively affect the scoring of the original awarded grant. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments or grant deadlines, must notify the OCD in writing of the proposed changes. Grantees will be allowed one amendment to move funds between public construction and on-site improvements. Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures. The OCD will consider amendment requests in application scoring during future funding rounds.

Local Program Period: PY 2020 Residential Public Infrastructure Grant Program grantees must complete their programs according to the following deadlines:

- 1) all activities (except audit and balance of administration) must be completed by the end of the 24th month;
- 2) all drawdown requests must be submitted to the OCD by the end of the 25th month; and
- 3) all funds must be disbursed and expended, and a final performance report must be submitted by the end of the 26th month.

Grant audit(s) must be conducted in accordance with 2 CFR 200, described in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

Committing Allocation Funds: Grantees committing PY 2020 Allocation grant funds to Residential Public Infrastructure Grant projects must reprogram the Allocation funds to other CDBG eligible activities if the Residential Public Infrastructure Grant application is not approved by September 1, 2020.

Coordination with other OCD programs: The OCD will work with the applicant to determine the best funding sources for a project. All project funding must be firmly committed at the time of application. The OCD will not consider an application for a subsequent grant request (e.g. *Community Development, Target of Opportunity, Appalachian Development*) after Residential Public Infrastructure funds are awarded. If a project includes more than one OCD funding source, the applications must be submitted at the same time.

Revolving Loan Fund Participation: Local units of government will be required to substantially disburse any existing Revolving Loan Fund balance in conjunction with or prior to submitting a funding application to the OCD for a specific water and sewer project.

Application Submission: Funding applications may be submitted beginning July 1, 2020. A Letter of Interest is required prior to submitting a full application. The Letter of Interest must include a brief narrative describing the proposed project and service area description, a summary of other funds committed to the project, a copy of the Ohio Environmental Protection Agency (OEPA) Permit to Install or Plan Approval, if applicable, a brief description of the community's current water and wastewater systems, and the community's Chief Elected Official's and grant writer's name, address, telephone number and email address. The OCD will review the Letter of Interest and notify the applicant if a full application will be accepted. The OCD will complete an initial review of the full application within 30 days of submission.

Readiness to Proceed: Project design must be completed prior to application submission. Applicants submitting projects requiring Ohio Environmental Protection Agency (EPA) review and approval must provide documentation of the Ohio EPA's approval with the application.

Direct Benefit Assistance: Applicants must address the way in which eligible low- and moderate-income households will connect to a new water or sanitary sewer service if funding for on-site improvements is not requested.

Assessments and Fees:

- 1) **Special assessment definition:** The term "special assessment" means a fee or charge levied or filed as a lien against a parcel of real estate as a direct result of benefit derived from installing a public improvement, such as streets, water or sewer lines, curbs and gutters. The amount of the fee represents the prorated share of the capital costs of the public improvement levied against the benefiting properties or a one-time charge made as an access condition to the public improvement. This term does not relate to taxes, or establishing real estate value for levying real estate, property or ad valorem taxes, nor does it include periodic charges based on using public improvements, such as water or sewer user charges, even if such charges include recovering all or some portion of the public improvement's capital costs.
- 2) **Special assessments to recover capital costs:** Where CDBG funds are used to pay all or part of public improvement cost, special assessments may be used to recover capital costs as follows:
 - a. Special assessments to recover the CDBG funds may be made only against properties owned and occupied by households not of low- and moderate- income. **Such assessments constitute program income.**
 - b. Special assessments to recover the non-CDBG portion may be made provided that CDBG funds are used to pay the special assessment on behalf of all properties owned and occupied by low- and moderate-income households; except that CDBG funds need not be used to pay the special assessments on behalf of properties owned and occupied by moderate-income households if the grant recipient certifies that it does not have sufficient CDBG funds to pay the assessments on behalf of all the low- and moderate-income, owner-occupant households. **Funds collected through such special assessments are not program income.**
- 3) **Other uses of CDBG funds for special assessments:** Program funds may be used to pay all or part of special assessments levied against a property when such assessments are used to recover the capital cost of eligible public improvements financed solely from sources other than CDBG funds, provided that:
 - a. The assessment represents that property's share of the capital cost of the improvements;
 - b. Installing the public improvements was carried out in compliance with requirements applicable to activities assisted under this part of the CDBG regulations including environmental, citizen participation and Davis-Bacon requirements; and
 - c. Installing the public improvement meets a national objective criterion.

Note:

- Under this program, special assessments cannot be paid for low- or moderate-income persons where the public improvement itself does not meet a national objective; and
- To “pay” an assessment for a low- or moderate-income person means to pay the whole assessment as a grant.

Rating System Principles:

A Residential Public Infrastructure Grant Program application must meet minimum program thresholds and eligibility criteria. The Residential Public Infrastructure Grant Program application will allow the OCD to determine the proposed project’s feasibility and fundability. **Meeting minimum threshold requirements does not guarantee project funding.**

Program thresholds include the following:

- 1) **Leverage:** The requested Residential Public Infrastructure Grant Program funds must, at a minimum, be matched on a one-for-one basis with funds from other sources. The other funds can be non- Residential Public Infrastructure CDBG funds, as well as funds from other public or private sources.
- 2) **Program Impact:** The project must alleviate the identified health hazard (this does not include fire hazards) or replace a functionally obsolete facility. A functionally obsolete facility is defined as a water treatment plant, wastewater treatment plant or water storage structure that is at least 40 years old and repairing the facility costs more than replacing the facility.
- 3) **System Sustainability/Financial Capacity/Rate Structure:** The system’s long-term sustainability will be evaluated based on rate structure, affordability, debt service, reserves for ongoing operations and maintenance, and user population demographics. Water and/or sewer fees must be in line with the following requirements:

For an area **without a water or sanitary sewer system:**

- User fees for a new water system or sanitary sewer system must be at least 1% of the area median household income (MHI) or \$30/month, whichever is less.

For an area **without a sanitary sewer system** that is interested in improving an existing **water system**, user fees for the water system must be at least 1% of the area MHI or \$30/month, whichever is less.

For an area **without a water system** that is interested in improving an existing **sanitary sewer system**, user fees for the sanitary sewer system must be at least 1% of the area MHI or \$30/month, whichever is less.

For an area **with a water system** that is interested in constructing a new **sanitary sewer system**, combined user fees must be at least 2% of the area MHI or \$60/month, whichever is less.

For an area **with a sanitary sewer system** that is interested in constructing a new **water system**, combined user fees must be at least 2% of the area MHI or \$60/month, whichever is less.

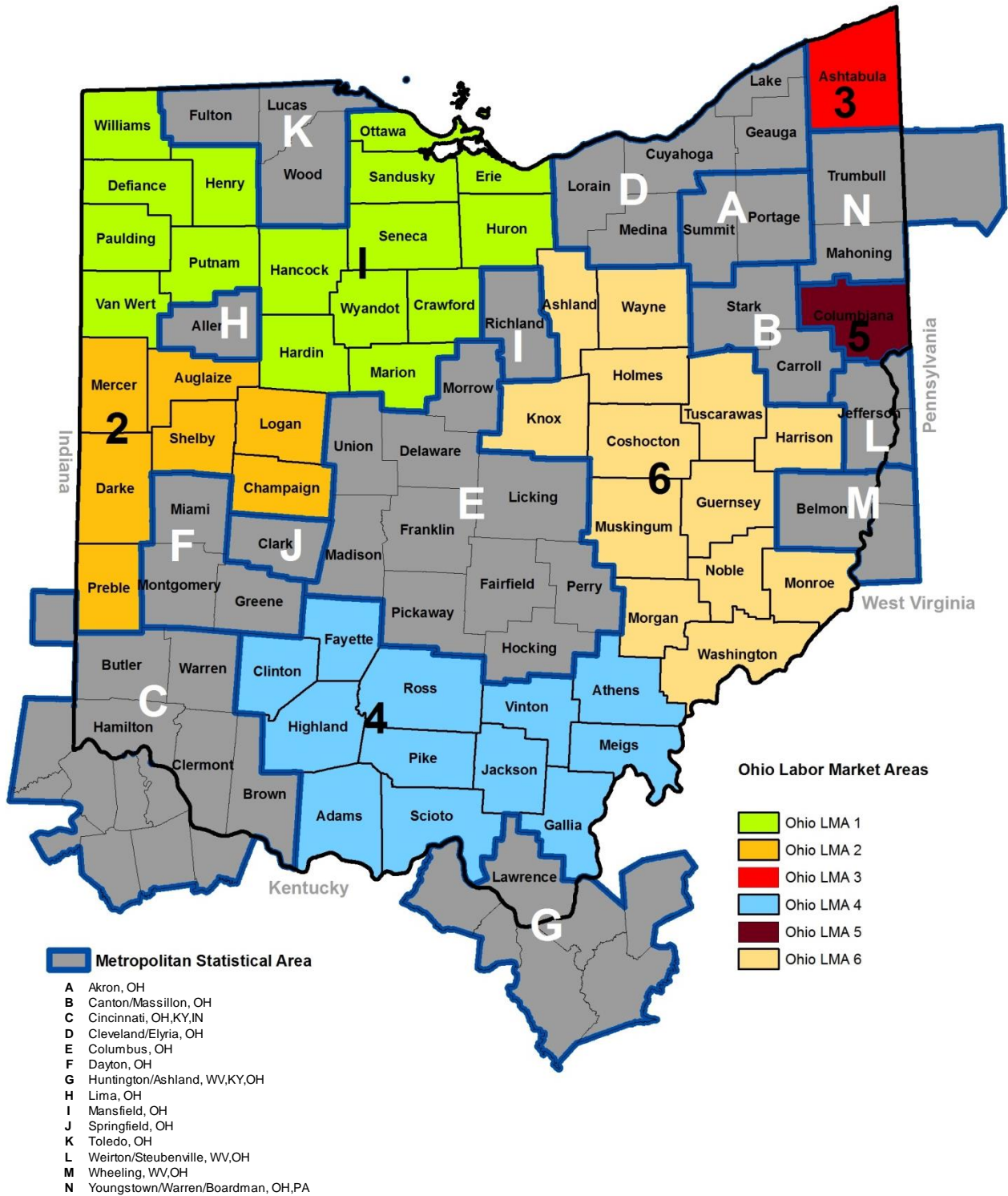
For an area **with both a water system and a sewer system** that is interested in improving **either system**, combined user fees must be at least 2% of the area MHI or \$60/month, whichever is less.

- 4) **Readiness to Proceed:** Project design must be completed prior to application submission. Applicants submitting projects requiring Ohio Environmental Protection Agency (EPA) review and approval must provide documentation of the Ohio EPA’s approval and Permit to Install with the application.

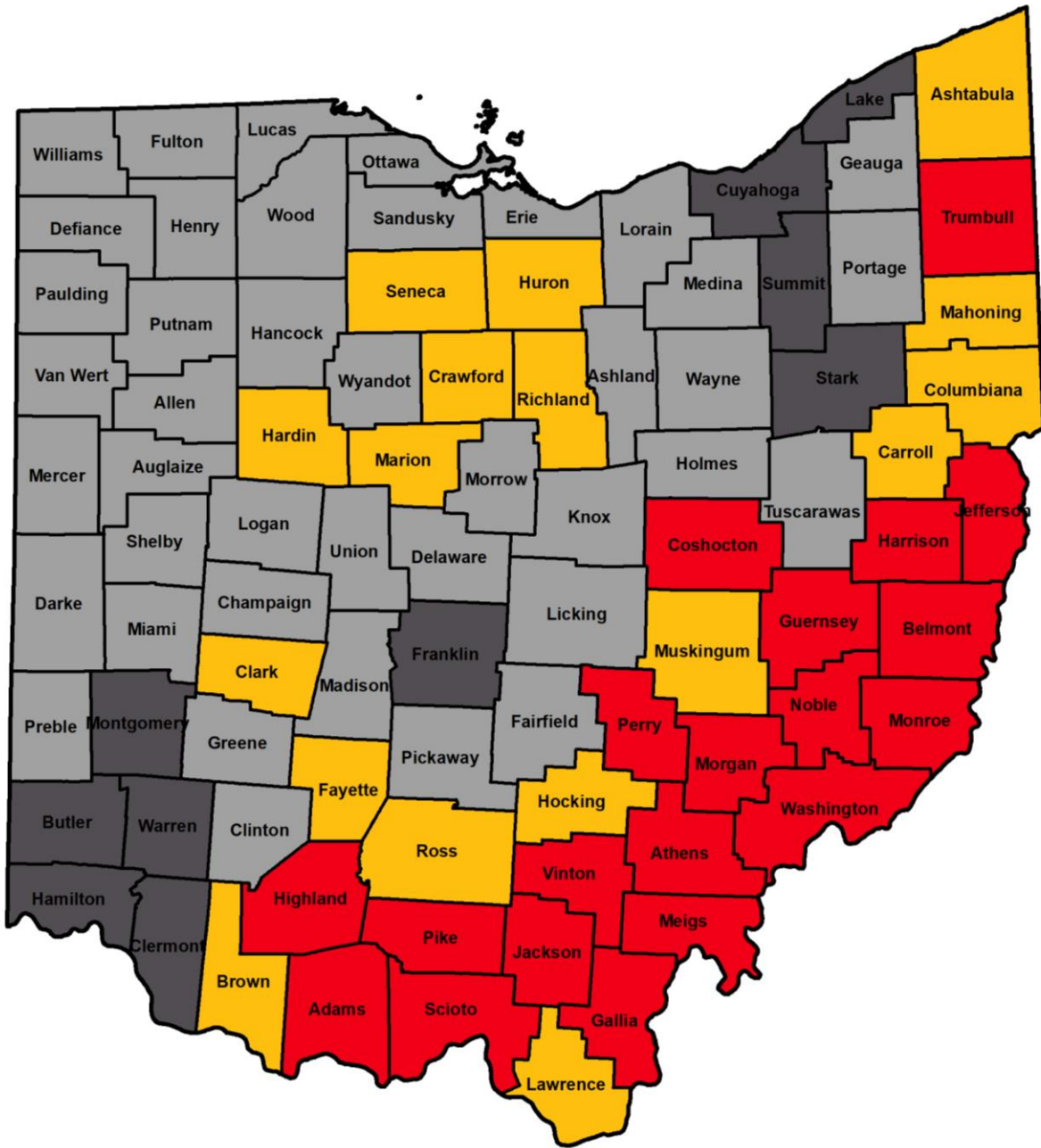
All applications will be rated according to the following criteria:

- 1) Benefit Impact (30 points): Percent of low- and moderate-income persons, and total number of persons benefiting from the program;
- 2) Program Impact (30 points): Communities under EPA mandates with documented health and safety hazards or documented lead water distribution lines will be given priority. Points will also be awarded for secondary standards violations and functionally obsolete systems.
- 3) Regionalization and Shared Services (15 points): The applicant is a part of a regional system, which is defined by the following criteria: a system established under Sections 6103, 6117 and 6119 of the Ohio Revised Code; a system connected to another system for the providing water or treating wastewater, a nonprofit system that serves more than one political subdivision; and a for-profit system (not company) that serves more than one political subdivision. Shared services include, but are not limited to, entering into long-term agreements for billing and plant operation with another public entity. Applicants must include a Summary of Alternatives with their application. The OCD reserves the right to not fund an application if the most cost-effective alternative was not selected.
- 4) System Sustainability Financial Capacity and Rate Structure, and Leverage (25 points): The system's long-term sustainability based on rates, affordability, debt service, reserves for ongoing operations and maintenance, leverage, and user population demographics and the community's ability to raise funds locally through user fees.

Map 1: 2020 CDBG Economic Development Program Labor Market Areas



Map 2: PY 2020 Ohio Distressed Counties*



Ohio Development Services Agency
Office of Community Development

Date: 12/3/2019

Target of Opportunity Grant Program

- **CDBG Target of Opportunity Grant Programs**
 - *Economic and Community Development Program*
 - *Downtown Revitalization Program*
 - *New Horizons Fair Housing Assistance Program – Set-Aside*

- **Ohio Housing Trust Fund (OHTF) Special Project Grant Program**

- **Emergency Shelter Target of Opportunity Program Grants**

Target of Opportunity Grant Programs

Goal: To provide a means to fund worthwhile "target of opportunity" projects and activities that do not fit within existing program structures, and to provide supplemental resources to resolve immediate and unforeseen needs.

Total Funds: Approximately \$2 million in PY 2020 CDBG funds and SFY 2021 Ohio Housing Trust Funds (amount to be determined).

CDBG Target of Opportunity Grant Programs: The CDBG Target of Opportunity Grant Programs provide funding for "target of opportunity" projects. The CDBG Target of Opportunity Grant Programs includes the Economic and Community Development Program, Downtown Revitalization Program and a set-aside for the New Horizons Fair Housing Program. Program requirements are outlined below. The CDBG Target of Opportunity Grant Programs must be administered according to all applicable federal and state laws and regulations.

Economic and Community Development Target of Opportunity Program: This program will provide funds for "target of opportunity" investments in:

- Economic development projects that create and/or retain permanent job opportunities and are not eligible for Economic Development Program funding or feasible within the Economic Development Program guidelines
- Community Development projects that are not feasible in other funding categories or eligible for Community Development Program competitive set-aside or open-cycle Critical Infrastructure funds
- Housing projects benefitting severely disabled adults. Benefitting populations must meet both CDBG Housing and Community Development Act of 1974 and Section 504 of Rehabilitation Act of 1973 eligibility requirements
- Youth Homelessness Demonstration Program projects
- Imminent threat grants covered by the federal CDBG Regulation
- Initiatives of the Director of the Ohio Development Services Agency that include CDBG eligible activities.
- Planning, including feasibility studies for property redevelopment, asset management, and resilience/mitigation
- Public services, including but not limited to; child care, services for victims of domestic violence, down payment assistance, drug abuse counseling and treatment, education, emergency assistance payment, energy conservation counseling and testing, health care, homeless services, job training, legal services, public safety, recreation, senior services, and transportation.

Grant Ceiling: Awards are negotiated based upon need and availability of funds.

Administrative Cost: A maximum of 10% or \$10,000, whichever is less, of the total grant amount may be used for general administration, implementation (including on-site delivery costs), environmental review, audit and close-out. The OCD will evaluate the community's request during application review and reserves the right to award less than the requested amount.

Eligible Jurisdictions: Cities, counties, or villages. All applicants must be able to demonstrate the ability to administer a Target of Opportunity Program. The OCD may require a county to apply for grant funds on the behalf of a city or village within its jurisdiction if administrative capacity cannot be demonstrated by the city or village.

State Agency Coordination: Projects including funding from the ODOT be bid, contracted, and administered by local government awarded CDBG funds. The OCD will not consider CDBG funding as match for an ODOT-administered project, unless the CDBG activity functions as a stand-alone project with independent bidding, contracting, and completion timelines or prior written approval of the local government's ODOT participation agreement.

Application Timing: Project applications will be accepted on an open-cycle basis from July 1, 2020 until April 30, 2021, or until such time the OCD commits available funding.

Program Period: The program period will be determined through negotiations with the OCD. Grant Audit(s) must be conducted in accordance with 2 CFR 200, as described in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

Application Procedures: An eligible community may apply for Economic and Community Development T of O funds at any time during PY 2020 by submitting a written request from the Chief Executive Officer. The request for funds must include a brief project description, information on how the project meets a national objective if the request is for CDBG funding, preliminary sources and uses table, and administration plan to the appropriate OCD Section Manager (i.e. Community Investments, Residential Revitalization or Supportive Housing).

The OCD staff will conduct initial submission reviews at least quarterly and notify the community if a full application should be submitted. Eligibility for CDBG assistance does not guarantee project funding.

Rating System Principles:

- Funds are not available from any other source and/or the requested funds fill a “gap”;
- Funds are needed to make the project financially feasible;
- Project is eligible and meets at least one of the CDBG national objectives; and
- Project furthers the State of Ohio’s investment objectives.

Downtown Revitalization Target of Opportunity Program:

Total Funds: Grant ceiling of \$250,000 per award. Total funds not to exceed 50% of PY 2020 CDBG Target of Opportunity Grant Programs funding.

Eligible Applicants: PY 2020 and PY 2021 Allocation Program counties and direct cities. Counties may apply on behalf of non-direct cities, villages, and unincorporated areas.

Eligible Activities: Structural rehabilitation, façade improvements, interior and exterior building code violation corrections, historic preservation, direct administrative costs, and architectural and engineering work related to specific revitalization activities.

Local Program Benefit/National Objective: Communities must qualify projects under the HUD Ohio State Administered CDBG program National Objective of Prevention/Elimination of Slum or Blight.

Spot Slum and Blight: Projects entailing a single property located outside of a designated blighted area must qualify under the Spot Slum and Blight National Objective. Activities qualified under the Spot Slum and Blight National Objective are restricted to those that eliminate specific conditions detrimental to public health and safety.

Area Slum and Blight: The designated geographic area must meet the state or local legal definition of a slum, blighted or deteriorated or deteriorating area in which there is a substantial number of deteriorated or dilapidated buildings/building elements and/or deteriorated public infrastructure elements. Substantial is defined as at least 51% of the buildings within the defined downtown target area. All activities funded under the slum or blight national objective must address one or more of the conditions that qualified the area as slum or blighted,

Historic Preservation: Historic preservation activities are restricted to sites or structures that are either listed in or eligible to be listed in the National Register of Historic Places, listed in a state or local inventory of historic places or designated as a state or local landmark or historic district by appropriate law or ordinance. CDBG funds used for historic preservation are restricted to activities that preserve historic building elements.

Historic preservation activities must be undertaken in such a way that allows the property to maintain its historic designation.

Program Investment Area: Projects must be in a defined Central Business District. Applicants must submit a building map of the downtown area indicating the target area boundaries and the location of proposed revitalization activities. Applicants are required to have adopted design review standards that include the Secretary of the Interior's Standards for Rehabilitation verbatim for the program investment area.

Applicants are required to submit either a statement signed by the applicant community's Chief Executive Officer (CEO) or a resolution passed by the governing legislative body, which declares the area or project site blighted and/or deteriorated or deteriorating, based upon state or local law. For Spot Slum and Blight projects, this statement or resolution must be accompanied by a Building Conditions Form that details the substandard condition of the property to be rehabilitated. For Area Slum and Blight projects, this statement or resolution must detail the program target area's condition at the time of its designation; downtown building inventories must have been conducted or updated within the 12-month period immediately prior to applying to the OCD to document the appropriate designation. Also, a map identifying the boundaries of both the target area identified in the local designation defined as slum or blighted and the proposed program target area, must be provided to the OCD with the statement or resolution.

Administrative Cost: A maximum of \$25,000 or 10% of the total CDBG project cost, whichever is less, may be used for general administration costs. **Communities may also use up to 10% of the CDBG hard cost per unit for soft costs.** Soft costs may be charged to each rehabilitation project and not counted against the administration cap. Eligible soft costs include program implementation and oversight, preparing environmental review, audit and closeout activities. Engineering, architectural and legal service costs related to activities undertaken with CDBG funds can be charged to the relative specific line item budget activity. Eligible soft costs for the CDBG Program are outlined at 24 CFR Part 570.202(b)(9).

Application Submission: Applications may be submitted beginning July 1, 2020. A Letter of Interest is required prior to submitting a full application. The Letter of Interest must include the administrative contact, a description of the target area, national objective, addresses of the building(s) to be improved, preliminary scope of work for each building, draft sources and uses budget, and adoption of the Secretary of the Interior's Rehabilitation Standards (area only).

Business/Building Owner Program Participation: Applications will require firm participation commitments from business/building owners, and a detailed scope of work and cost estimate for each project. Cost estimates must be calculated using applicable federal prevailing wage rates. All work must be completed by third-party contractors; business/building owners may not use in-kind or donated labor or be paid with CDBG funds.

Number of Projects: Applicants are limited to three (3) building rehabilitation projects per grant award. Applicants may assign funds without a per project grant ceiling or floor.

Local Program Period: Award recipients must complete their programs according to the following deadlines:

- 1) all activities (except audit and grant administration) must be completed by the end of the 24th month;
- 2) all drawdown requests must be submitted to the OCD by the end of the 25th month; and
- 3) all funds must be disbursed and expended, and a final performance report must be submitted by the end of the 26th month.

Grant audit(s) must be conducted in accordance with 2 CFR 200, described in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures.

Program Amendments: Because grant awards are based on the projects proposed in the application, grantees receiving CDBG Target of Opportunity Grant Programs funds are discouraged from changing their

approved projects. The OCD will consider, on a case-by-case basis, only those changes that do not negatively affect the scoring of the original competitively awarded grant. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments or grant deadlines, must notify the OCD in writing of the proposed changes. Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy and Procedures. The OCD will consider amendment requests in application scoring during future funding rounds.

The OCD reserves the right to adjust funding levels between Target of Opportunity Program categories according to project and funding availability.

New Horizons Fair Housing Assistance Program – Set-Aside

Goal: To provide funds to units of local government or consortia of units of local government, to affirmatively further fair housing and eliminate impediments to fair housing. Activities funded with New Horizons grants must be in addition to a grantee’s Standard Fair Housing Program, which is required as part of the Allocation Program and CHIP Program applications. New Horizons fair housing strategies are to be based on locally assessed needs and further the state’s fair housing goals.

Total Funds: \$50,000 CDBG funds will be allocated for PY 2020.

Note: All funds that haven’t been allocated by April 15, 2021, will be reallocated to the Economic and Community Development Target of Opportunity Program.

Grant Ceiling: Up to \$15,000 for one jurisdiction, and up to an additional \$5,000 for each additional eligible jurisdiction in a consortium, for a maximum award not exceeding \$30,000.

Eligible Jurisdictions: Applicants must be direct Allocation Program cities or counties. Consortium members may be direct Allocation Program cities or counties, or CHIP Program CDBG-eligible jurisdictions.

Eligible Activities: Implementing strategies to address impediments to fair housing choice; activities that affirmatively further fair housing; and actions to remedy or mitigate conditions limiting fair housing choice. Activities must exceed minimum Standard Fair Housing Program requirements (See *Local Government Certifications to the State*). A maximum of 15% of the total grant request may be used for general administration.

Application Timing: Ongoing. Approximately one-third of the available funds will be awarded in each three-month cycle, but the state reserves the right to determine the final funding level of each respective cycle.

Application Submission: July 1, 2020 to March 31, 2021

Rating and Selection Criteria: All applications are reviewed, rated and scored based on the criteria outlined below. The process is competitive and designed to rank, in order, applicants to be offered funding with the available New Horizons funds. To be eligible for consideration, applicants must achieve a minimum score of 72 out of 100.

Threshold Review: Applications that do not meet the minimum threshold requirements will not be scored or funded. Threshold requirements are:

- 1) the (lead) applicant is a direct Allocation grantee;
- 2) all tables are included and complete;
- 3) application is signed by the CEO;
- 4) application includes authorizing legislation for the applicant and consortium members;
- 5) proposed activities are eligible;
- 6) proposed activities exceed Standard Fair Housing Program requirements; and
- 7) The OCD has monitored previous New Horizon grants.

Program Design/Impact (40 points): The appropriateness and effectiveness of the proposed program's actions to address impediments to fair housing; the benefit to current housing activities and programs; and the degree to which the program is designed to create on-going local capacity.

Administrative Capacity/Past Performance (30 points.): The adequacy of the proposed administrative plan, the applicant's experience and capacity for implementing the proposed activities, evaluating past program performance and compliance.

Cost Effectiveness (20 points): The degree to which the cost of an outcome is reasonable and appropriate for the proposed activity and the degree to which the cost of general administration is reasonable and appropriate.

Leverage and Coordination (10 points): A comparison of the amount of funds committed to fair housing in the past two years' Allocation Program and the extent to which the proposed program integrates and coordinates with other local programs, funds and activities

Grant Award: Approximately four weeks after submission.

Program Period: Grantees have until the end of the 12th month to complete activities, all funds must be drawn by the end of the 13th month, and the grant must be closed out and the Final Performance Report must be submitted by the end of the 14th month. Grant Audit(s) must be conducted in accordance with 2 CFR 200, as described in Policy Notice 18-01, Grant Operations and Financial Management Policy.

Program Amendments: Because grant awards are based on the projects proposed in the application, grantees receiving Target of Opportunity funds are discouraged from changing their approved projects. The OCD will consider, on a case-by-case basis, only those changes that do not negatively affect the scoring of the original competitively awarded grant. Grantees considering a change in program scope, location or design, number and type of beneficiaries, anticipated accomplishments or grant deadlines, must notify the OCD in writing of the proposed changes. Formal OCD approval through the Grant Amendment Request in OCEAN and executing a grant amendment is required before making the changes. The OCD Amendment Policy is outlined in Policy Notice 18-01, Grant Operations and Financial Management Policy. The OCD will consider amendment requests in application scoring during future funding rounds.

Ohio Housing Trust Fund (OHTF) Special Projects Grant Program:

Goal: OHTF Special Projects Grant Program provides funding for projects and innovative proposals that will principally benefit persons below 50% of the area median income and meet the OHTF rules and requirements. Projects or activities must be supported by statewide or regional organizations that serve multiple counties or provide statewide services projects that are not feasible in other funding categories. Proposals must align and support Development's priorities and programs.

Total Funds: The funds made available for the SFY 2021 Ohio Housing Trust Funds Special Projects Grant Program will not exceed 2% of the total OHTF SFY 2021 Allocation, which has yet to be determined.

Grant Ceiling: Funding level is determined based upon demonstrated need. OHTF Special Projects Grant Program for individual special projects typically will not exceed \$200,000 annually. Applicants whose requests may exceed the \$200,000 request should submit a waiver to the OCD.

Matching Funds: Projects should evidence at least a dollar-to-dollar match in cash and/or direct in-kind services. Signed letters of commitment must be included as part of the application.

Eligible Applicants: In order to be eligible to apply for the OHTF Special Projects Grant Program, applicants must submit a pre-application form, letter of interest signed by the CEO, and verification that the applicant is a statewide or regional nonprofit organization incorporated with Ohio's Secretary of State and granted 501(c)(3) status by the Internal Revenue Service to the OCD by **February 28, 2020**. The pre-application form must include the following items:

- A project description that provides an overview of how the proposal fills an unmet need or gap that will benefit persons at or below 50% area median income.
- Indicate how the proposal cannot be funded with other Development and OHTF funding sources.
- Project services are to determine if the proposal will be statewide or serve multiple counties.
- The funding amount requested.
- The dollar-to-dollar match amount included with sources identified.

Board Resolution: The Board Resolution authorizing the organization to apply.

Eligible Activities: Proposals considered for Special Projects Grant Program funds must be inappropriate for funding from other state housing programs, either due to eligibility, program scope or project timing. Projects must result in identifiable outcomes and beneficiaries (cannot be seed money or start-up funds).

Project Outcomes: Projects must result in identifiable outcomes with projected beneficiaries identified.

Administrative Capacity Statement: A description of administrative capacity to administer program, identifying the staff assigned to administer the grant. The applicant can discuss the organization's past historical success administering the program or how they seek to improve program administration moving forward if they had findings in past monitoring.

Implementation Plan: The program period should be stated with milestones for project completion identified. Proposals may request multi-year funding for up to three (3) years.

Application Timing: The SFY 2021 OHTF Special Projects Grant Program application deadline is March 30, 2020.

Application Review: Upon application submission, the application(s) will be reviewed by the OCD, other state agency staff (if appropriate) and the OHTF Advisory Committee. The Development director will make the final decision regarding project funding.

Rating System Criteria:

1. Impact (**Maximum of 40 points**)
 - The proposal will include outcomes that address a specific need in the project description.
 - The proposal will leverage other resources with commitment letters included.
 - The proposal will benefit persons or households at or below 50% area median income (AMI).
2. Program Design (**Maximum of 40 points**)
 - Proposals considered for Special Projects funds must be inappropriate for funding from other state housing programs, either because of eligibility, program scope or project timing.
 - The proposal cannot be funded with other Development Services Agency and OHTF funded programs.
 - Extent to which the project or activity fills an unmet need or gap by providing activities that benefit persons at or below 50% AMI by addressing one of the following:
 - improving housing conditions;
 - increasing housing availability, affordability or accessibility;
 - educating and informing the public about housing issues, including housing counseling; and
 - preventing homelessness through direct housing assistance or supportive services.
3. Administrative Capacity (**Maximum of 10 points**)
 - Description of administrative capacity to administer program.
 - The Implementation Plan is reasonable with milestones clearly identified.
4. Quality of Application (**Maximum of 10 points**)
 - Includes all required attachments.
 - Board Resolution is included.
 - Application is submitted on time.

Emergency Shelter Target of Opportunity Program Grants

Approximately \$200,000 of SFY 2021 Ohio Housing Trust Funds are available through the PY 2020 Target of Opportunity Program (T of O). Eligible applicants are primarily limited to PY 2018 and PY 2019 Supportive Housing Program and Homeless Crisis Response Program grantees.

The PY 2020 Emergency Shelter T of O Program priority is to provide funds for critical activities at existing OCD-funded emergency shelter locations. As a secondary priority and based on need and availability, these funds may also be used to fund emergency activities at the OCD-funded organizations that serve homeless populations through other supportive housing models as well as organizations providing emergency shelter, but not receiving the OCD homeless assistance funds. All activities must be deemed an emergency or include needs that could not be anticipated during the normal funding program cycle.

Application Procedures: Applicants must submit a Homelessness T of O Grant Program application electronically via OCEAN.

The OCD will respond with the award decision or to request additional information. Requests for additional information for project/activity review do not guarantee that any request will be funded.

Rehabilitation Project Requirements: Rehabilitation projects will be reviewed for compliance with local health, building and zoning regulations; site control evidence, lease agreement or other arrangements for the project; property/building appraisal; extent to which financing is secure; proposed budget reasonableness and proposed project completion time frame reasonableness. Rehabilitation projects must include a detailed, itemized estimate that includes labor and material costs. Estimates must be on an authorized contractor's letterhead.

Program Period: Grantees must complete their program according to the following deadlines:

- (1) all activities must be completed, and costs paid with grant funds incurred by the end of the work completion date identified in the grant agreement;
- (2) all drawdown requests must be submitted to the OCD within one month of the work completion date; and
- (3) a final performance report must be submitted within two months of the work completion date.

Program Application Deadlines and Grant Award Cycles

Community Housing Impact and Preservation Program

Application Submission: June 24, 2020
Grant Award: September 1, 2020

Housing Assistance Grant Program

Application Submission: October 7, 2020
Grant Award: Approximately 12 weeks after submission

Homeless Crisis Response Program

Application Submission: July 23, 2020
Grant Award: Approximately four months after submission

Supportive Housing Program

Application Submission: August 20, 2020
Grant Award: Approximately four months after submission

Housing Opportunities for Persons With AIDS Program

Application Submission: October 29, 2020
Grant Award: Approximately seven weeks after submission

Community Development Program (Allocation Grant / Neighborhood Revitalization Grant / Downtown Revitalization Grant / Critical Infrastructure Grant - Round 1)

Application Submission: June 17, 2020
Grant Award: September 1, 2020

Economic Development Program

Applications may be submitted on a continuous basis throughout the program year, beginning on July 1, 2020. Awards will be made approximately 45 days after application submission.

Residential Public Infrastructure Grant Program

Applications may be submitted on a continuous basis throughout the program year, beginning on July 1, 2020.

Target of Opportunity Grant Program

Note that the Target of Opportunity Grant Program includes: (A) CDBG Target of Opportunity Grant Programs, (B) Ohio Housing Trust Fund Special Project Program Grants and (C) Emergency Shelter Target of Opportunity Program Grants.

Application submissions will be accepted, and grant awards will be made throughout the program year. All specific program deadlines and award dates are included under the program.

Geographic Distribution of Funds

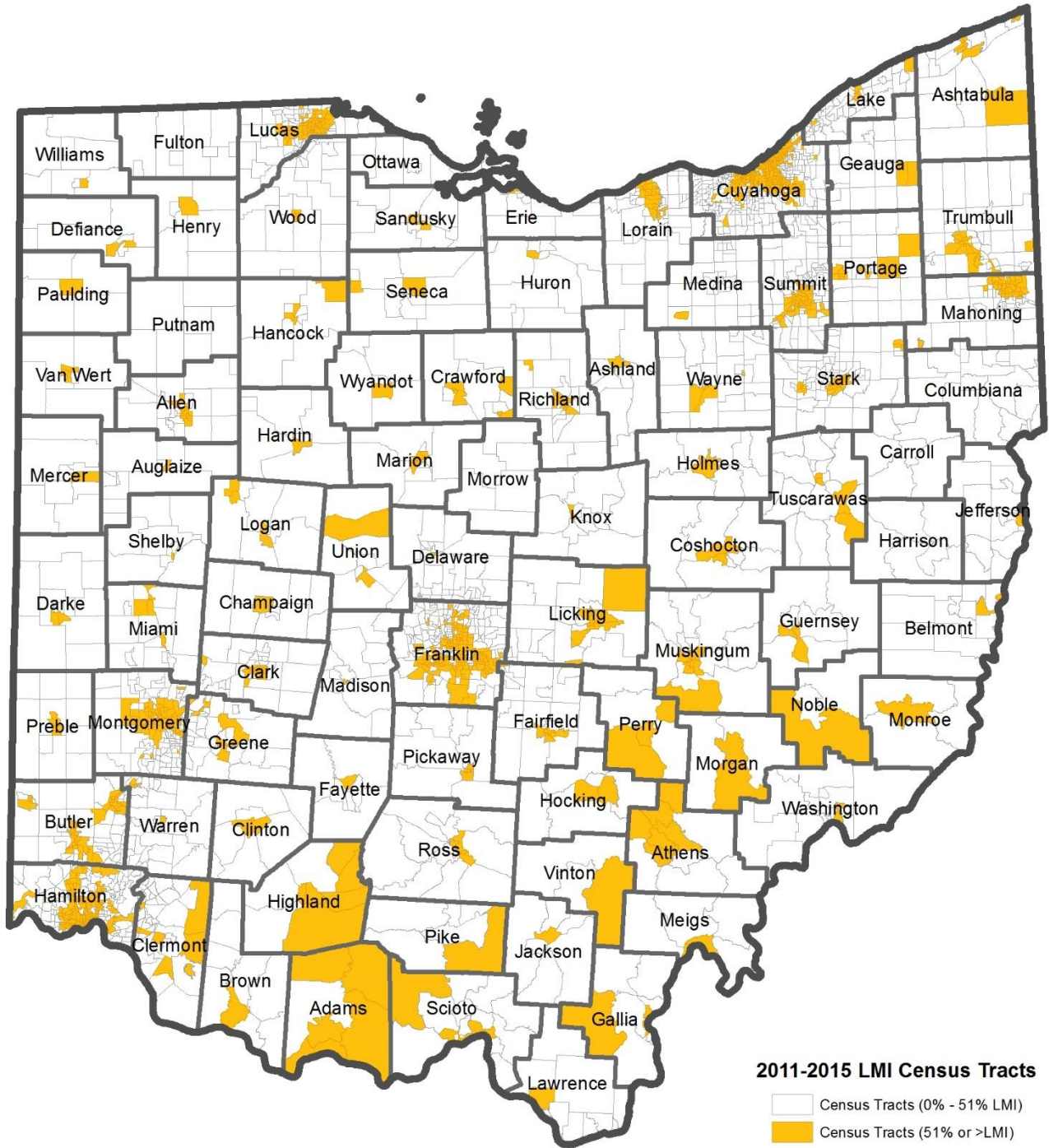
The OCD does not have a geographic targeting strategy, insofar as it does not select areas of the state which will be exclusively awarded funding through a particular program. Such decisions are left to the local communities, which may restrict funding to particular neighborhoods or target specific geographic areas. However, many of the OCD's competitive programs prioritize projects and activities that benefit communities with comparatively higher need levels. However, relative differences in local need is only one of many factors in the decision-making process.

The Neighborhood Revitalization Grants that are offered annually through the Community Development Program are the most highly geographically targeted funds. CDBG funds that have yet to be determined are targeted to neighborhoods and communities that are 51% or more low- or moderate-income and are intended to address multiple needs in the community to make a significant impact on the overall quality of life in the area. The Community Development Program overall requires that communities receiving Allocation Grants target and expend at least 50% of their funding on local neighborhood target areas and other community needs in their local community development plans.

Map 3 shows the Census Tracts in the state that have 51% or more LMI populations, based on the 2011 – 2015 American Community Survey information released in February 2020. Also, Map 4 shows the concentrations of minority households in the state, based on the 2010 U.S. Census minority population data for all census tracts within the state. Many of the lower-income areas have also been designated as targeted Investment Areas in their local communities.

It should be noted that not all of these federal funds are available in all areas of the state and some programs have placed limits on funding availability in certain geographic areas, particularly in areas of the state that receive additional direct funding from HUD. These restrictions are noted in the program descriptions in the Program Allocations section of the plan. Maps 5, 6, 7, and 8 show communities that receive direct allocations from the CDBG, HOME, ESG, and HOPWA Programs.

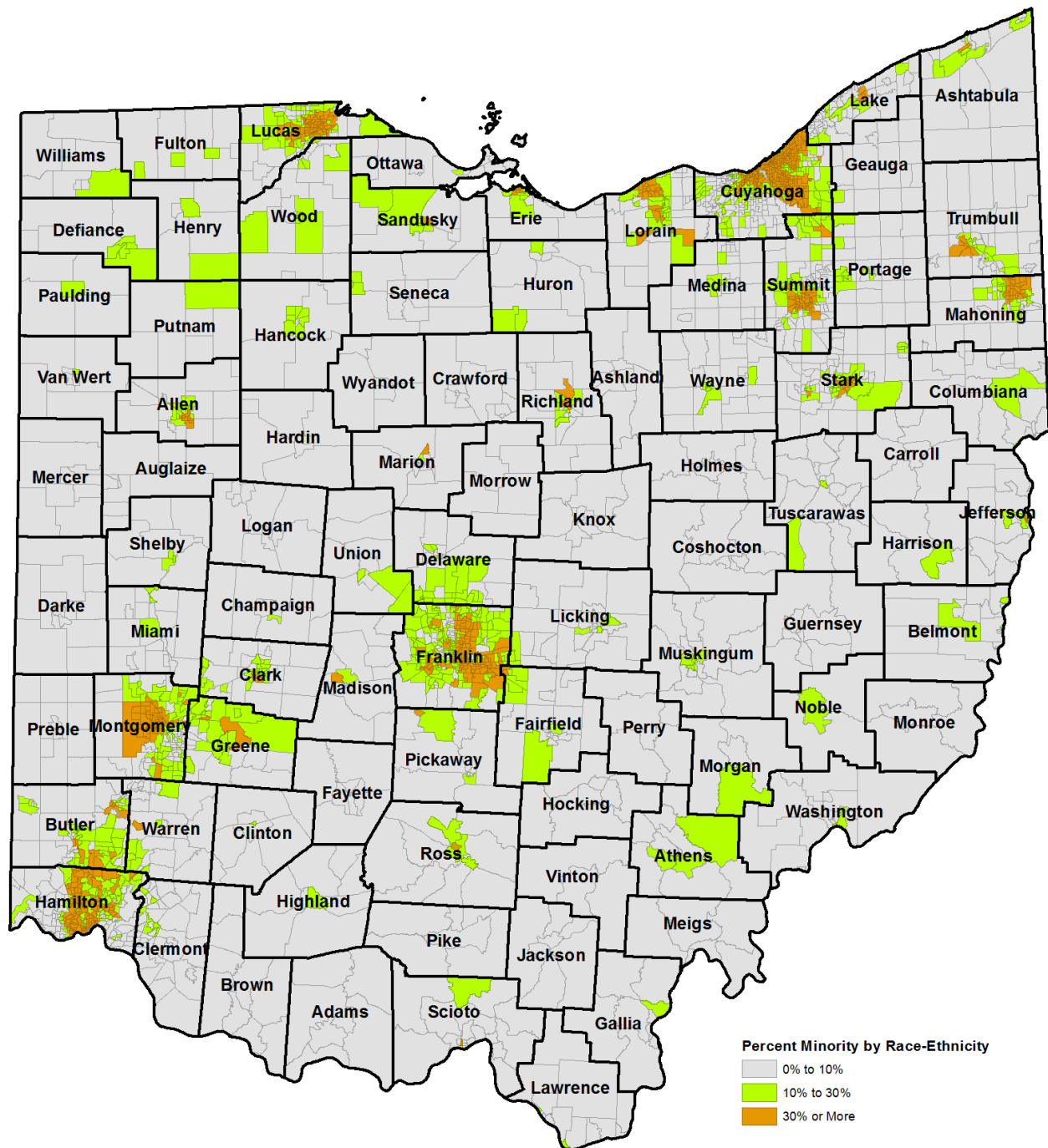
Map 3: Ohio Census Tracts with LMI Populations Greater than or Equal to 51%



Source: 2011 - 2015 American Community Survey

Prepared by the Office of Community Development
 Community Services Division
 Ohio Development Services Agency (February 2019)

Map 4: Ohio Census Tracts with Areas of Minority Concentration (2010)



Source: 2010 U.S. Census

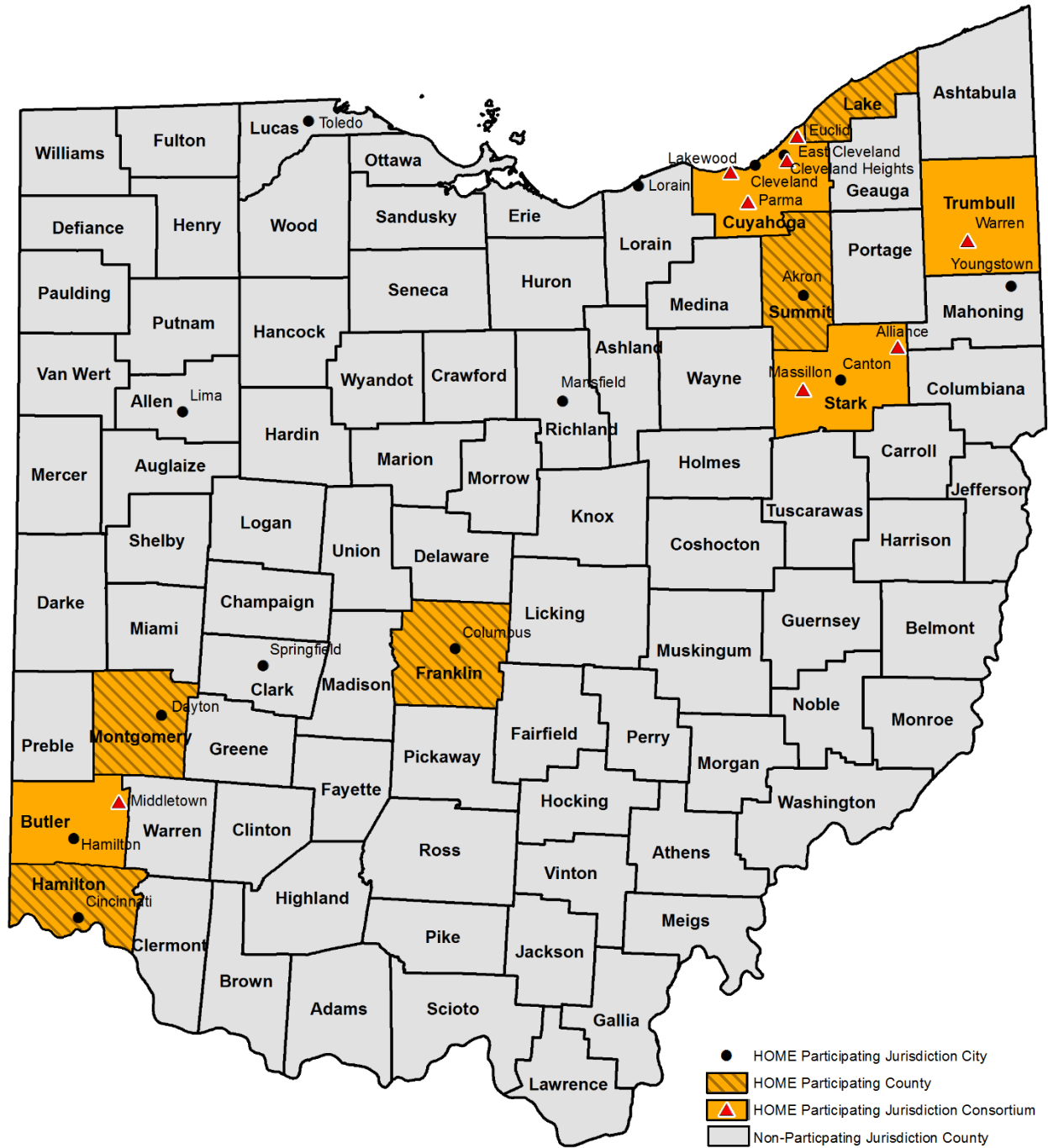
Prepared by the Office of Community Development
 Community Services Division
 Ohio Development Services Agency (December 2013)

Map 5: U.S. Department of Housing and Urban Development CDBG Program 2020 Entitlement Cities and Urban Counties



Prepared by the Office of Community Development
Community Services Division
Ohio Development Services Agency (February 2015)

Map 6: U.S. Department of Housing and Urban Development HOME Investment Partnerships Program Participating and Non-Participating Jurisdictions



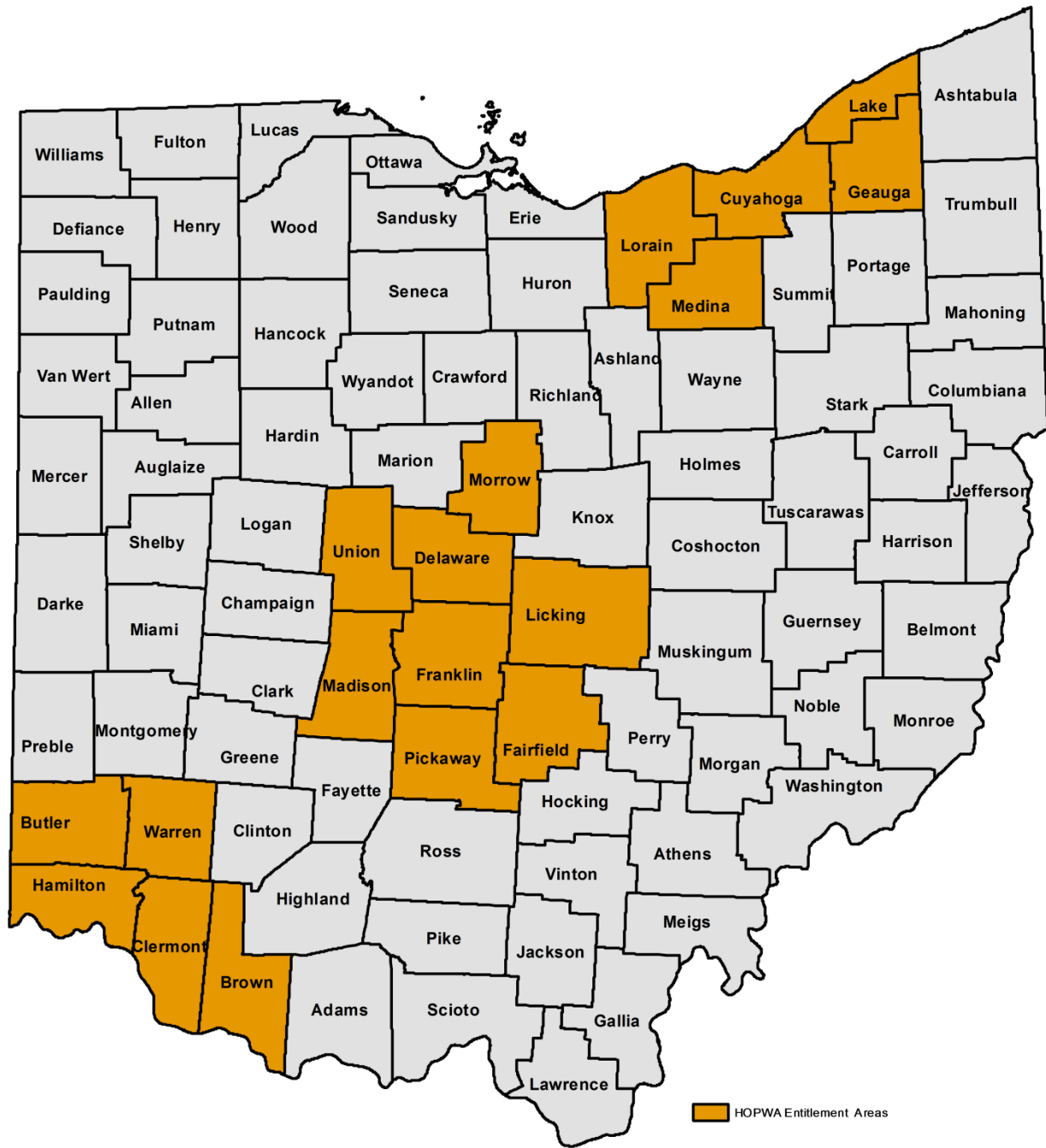
Prepared by the Office of Community Development
Community Services Division
Ohio Development Services Agency (December 2013)

Map 7: U.S. Department of Housing and Urban Development Emergency Solutions Grant Program Entitlement Cities and Counties



Prepared by the Office of Community Development
Community Services Division
Ohio Development Services Agency (December 2013)

Map 8: Housing Opportunities for Persons with AIDS (HOPWA) Entitlement Areas



Prepared by the Office of Community Development
 Community Services Division
 Ohio Development Services Agency (December 2013)

Homeless and Non-Homeless Special Needs Activities / Continuum of Care Strategy

Development will continue its Continuum of Care (CoC) approach to homelessness in Ohio. This includes programs and services addressing each stage of the homeless continuum: homeless prevention, emergency shelter, transitional housing, rapid re-housing, permanent supportive housing and aftercare programs. Emphasis has been placed on preventing individuals and families from experiencing homelessness and, where homelessness does occur, rapidly moving individuals and families into permanent, sustainable housing.

Homelessness Prevention

Development will continue to provide financial assistance and services to prevent individuals and families from becoming homeless through the Homeless Crisis Response Program (HCRP) shelter diversion activities and limited homelessness prevention assistance. Funds for homelessness prevention activities must be targeted to individuals and families who would be homeless without this assistance, and meet the following minimum criteria:

- 1) have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs;
- 2) be below 30% of Area Median Income (AMI); and
- 3) be at risk of losing housing, have no appropriate subsequent housing options and lack the financial resources and support networks needed to remain in existing housing.

Eligible assistance includes short or medium-term rental assistance and housing relocation and stabilization services, including such activities as mediation, credit counseling, security or utility deposits, utility payments, moving cost assistance, and case management.

Rapid Re-Housing

Development will provide for rapid re-housing through the HCRP. Persons served in this category must be homeless according to HUD's definition and below 30% of Area Median Income (AMI). Income is an eligibility requirement at the 90-day recertification date. Rapid Re-housing programs provide short- or medium-term rental assistance and services for households that are currently homeless, with the goal of being able to maintain housing after the subsidy ends. This assistance may include rental assistance (including back rent for months where the household has been unable to pay), utility deposits, security deposits, and/or moving costs. Housing models that require tenants to move out of their unit at the end of assistance are not eligible under this category.

Emergency Shelter

Development will continue to provide Emergency Shelter assistance to homeless families and individuals through the HCRP. HCRP funds provide emergency shelter and supportive services to homeless persons in Ohio. The OCD provides grants to eligible nonprofit organizations and units of local government to maintain, operate and staff emergency shelters for and provide essential services to the homeless.

Transitional Housing

Development will provide transitional housing through the Supportive Housing Program. This will include housing and supportive services designed to help program participants attain permanent housing in a four- to 24-month period with a preference of less than 12 months. Housing can be provided in units operated by the agency or in independent rental units in the community. For the purpose of this program, supportive housing activities are limited to facility-based or sponsor-based program models, either single-site or scattered-site.

Permanent Supportive Housing

The permanent supportive housing component of the Supportive Housing Program provides housing and supportive services to maximize disabled homeless individuals' and families' ability to live more independently within the permanent housing environment. Along with housing, these projects offer case management and services such as employment assistance and life skills.

Non-Homeless Special Needs

As in the past, the Ohio Department of Mental Health and Addiction Services (OhioMHAS) and the Ohio Department of Developmental Disabilities (ODODD) have a variety of programs to assist special needs non-homeless populations in the State (see the Resources section of the Consolidated Plan).

Development will also provide funding for non-homeless special needs populations through the Housing Opportunities for Persons with AIDS (HOPWA) Program and Housing Assistance Grant Program. The HOPWA Program will provide nonprofit agencies with the resources to devise and implement long-term comprehensive strategies for meeting the housing needs of individuals and families with acquired immunodeficiency syndrome (AIDS) or related diseases. The HOPWA Program provides the following housing and supportive services: short-term emergency rental and utility assistance, operating costs for community residences, assistance with finding affordable permanent housing, case management, respite care, day care, transportation, etc.

The Housing Assistance Grant Program will also continue to fund programs that provide emergency home repairs. The program assists a variety of low-income persons with the priority being homeowners. Some funded programs target persons with a disability or persons older than 60 years old, oftentimes accessibility modifications.

Statewide Coordination

Statewide homeless policies are coordinated in collaboration with all Continua of Care through participation in the Housing and Homelessness Collaborative. The federal Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act requires that each CoC establish targets and show annual progress in achieving those targets and reducing homelessness. The Collaborative will receive and review bi-annual progress reports in five primary population areas (veterans, chronic homelessness, families and children, youth and young adults and single adults). In addition, the Collaborative is committed to monitoring Ohio Department of Education data on homeless school-age children to understand homelessness under a broader definition of homelessness than used by HUD. By reviewing the bi-annual progress reports, the Collaborative will be able to celebrate success in progressing areas; adjust strategies and actions to identify and implement ways to improve progress in lagging areas, and address emerging needs by adopting or modifying strategies and actions to incorporate changing realities.

CoCs are required by HUD to maintain a functional HMIS, conduct an annual point-in-time count, regularly measure their progress in meeting the needs of people experiencing homelessness in their community and to report this progress through several reporting mechanisms. Progress on these key measures will be assessed annually on an aggregate statewide and CoC basis (overall and by individual and family households):

- Overall reduction in the number of homeless individuals and families.
- The length of time individuals and families remain homeless
- The length of stay in emergency shelter, transitional housing and rapid rehousing
- Successful housing placement to or retention in a permanent housing destination
- Successful placement from street outreach to emergency shelter, transitional housing or permanent housing destination
- The extent to which individuals and families who leave homelessness experience a subsequent episode of homelessness
- Jobs and income growth for homeless individuals and families
- Success at reducing the number of individuals and families who become homeless for the first-time
- Utilization rate by intervention type (emergency shelter, transitional housing, and permanent supportive housing)
- Entries from homelessness by intervention type (emergency shelter, rapid rehousing, transitional housing, and permanent supportive housing)
- HMIS bed coverage and compliance with HUD data quality standards
- To be defined and if feasible: Cost efficiency to attain successful housing placement by intervention type (total cost/successful outcome)

State agencies which fund targeted homelessness programs (Development and OHFA) will report on annual funding allocations and identify ways these funding allocations support and align with the Plan. In addition, these agencies will begin incorporating the key measures described above into their funding processes and include progress on these measures as basis for continuing funding. Each funding program should establish a set of minimum standards and target performance standards. The Plan describes optimal performance metrics for some of the key measures which can be used to develop the targets. Implementing minimum standards and target performance standards provides an opportunity to identify and reward high-performing projects and providing targeted assistance to low-performing projects.

Youth

The Ohio Department of Job and Family Services (ODJFS) oversees two new programs which incorporate housing and services to better serve youth.

- Bridges ([House Bill 50, 131st General Assembly, 2016](#)): The Bridges program is a voluntary entitlement program administered by ODJFS and available to youth who left the custody of an Ohio Public Children's Service Agency (PCSA) at age 18 or older but have not reached their 21st birthday. If eligible youth meet program eligibility criteria and sign a voluntary participation agreement to participate in the program, the Bridges program can provide support and resources that help them transition from foster care into self-sufficient and productive members of their community. The Bridges program can assist with stable housing; support in completing educational goals and gaining access to employment resources and services that promote personal well-being and necessary community resources.
- Comprehensive Case Management and Employment Program (CCMEP): This program serves low-income Ohioans aged 16-24 by combining Temporary Assistance for Needy Families (TANF) and the Workforce Innovation and Opportunity Act (WIOA) Youth programs. CCMEP provides employment and training services to eligible individuals based on an assessment of employment and training needs, as well as a basic skills assessment. Participants are provided services to support goals outlined in their individual opportunity plan, which may include support to obtain a high school diploma, job placement, work experience and other supportive services such as housing and transportation.

Runaway Homeless Youth (RHY) Program funding is awarded by the Family and Youth Services Bureau through the U.S. Department of Health and Human Services' Administration for Children and Families. There are several grantees in Ohio as of 2017. Services available are Basic Center Program consisting of up to 21 days of shelter, food, clothing, medical care, mental and physical health services, education and employment assistance and individual, group, and family counseling. Transitional Living Program/Maternity Group Home Program services consist of individual and group counseling, life skills training, interpersonal skill building, educational advancement, job attainment skills and physical and behavioral health care. Street Outreach Program consists of basic needs including food, clothing, hygiene, or first aid packages and information about services and safe places and encouragement to enter them.

Mental Health

The OhioMHAS is committed to ensuring that an array of safe, decent and affordable housing options is available for Ohioans experiencing mental illness. It's important to note OMHAS' services have been greatly expanded in recent years to be able to serve persons experiencing homelessness. Currently, OhioMHAS has two programs with a focus specifically on homelessness.

PATH: PATH services are for people with serious mental illness (SMI), including those with co-occurring substance use disorders. Population of Focus include those who are:

- experiencing a serious mental illness (SMI)
- experiencing homelessness, or
- at risk of becoming homeless

CABHI-States (2014-2017): The purpose of this program is to enhance or develop the infrastructure of states and their treatment service systems to increase capacity to provide accessible, effective, comprehensive, coordinated/integrated and evidence-based treatment services; permanent housing; peer supports and other critical services. Population of Focus:

- Veterans who experience homelessness or chronic homelessness, and
- Other individuals (non-veterans) who experience chronic homelessness

CABHI-States Enhancement (2015-2017)

The purpose of this program is for states that receive CABHI-States grants in FY 2013 and FY 2014 to further develop, enhance and/or expand their infrastructure and treatment service system. Population of Focus:

- Individuals who experience chronic homelessness and have substance use disorders, serious mental illnesses (SMI), or co-occurring mental and substance use disorders; and/or
- Veterans who experience homelessness/chronic homelessness and have substance use disorders, SMI, or co-occurring mental and substance use disorders.

Rehabilitation and Corrections:

The Bureau of Community Sanctions distributes and monitors grant and contractual funds provided to local jurisdictions and private vendors to establish community sanctions and residential services for adult offenders that are re-integrating into the community or who, otherwise, would be incarcerated in local jails or state prisons. Programs funded by the Bureau include Halfway Houses, Community-Based Correctional Facilities, Community Residential Centers, Permanent Supportive Housing and Community Corrections Act grant programs including Intensive Supervision Probation, Standard Probation, Prosecutorial Diversion, Non-Supervisory Treatment Programs, Electronic Monitoring and Community Work Service. Additionally, the Bureau has provided Probation Improvement Grants, Probation Incentive Grants, and SMART Ohio Grants to alleviate voids in services.

The Bureau of Recovery Services (BRS) works to instill in offenders an improved sense of responsibility and the ability to become law-abiding citizens through the provision of all core function services in the treatment for offenders in institution and community settings who need substance abuse recovery programming. The bureau provides and works to expand and enhance substance abuse treatment approaches that build on state-of-the-art scientific and practical knowledge:

- To improve treatment outcomes for offenders
- To provide a seamless holistic approach to alcohol and other drug (AOD) treatment

The treatment setting includes screening and education for all reception inmates; various intensities and modalities of AOD programs at parent institutions; and continuing care that includes referrals to aftercare programming for offenders throughout their incarceration. And, upon release, referrals to community providers for offenders released without post-release control; and to Chemical Dependency Specialists (CDS) in the Adult Parole Authority for offenders with post-release control (e.g. parole, furlough).

The Adult Parole Authority's CDS staff strive to reduce criminal activity by providing a continuum of quality care for the community supervised offenders before and after release by coordinating substance abuse treatment approaches among providers within DRC institutions, APA Field Offices, and community agencies.

M.U.S.C.L.E. is a centralized guide for Department staff, offenders, families, and community partners that helps locate community resources and information to foster strong, safe communities. The Reentry Resource Guide is a collection of county by county fact sheets that provides vital information to assist offenders' reentry into society. Areas include social services, human services, local, county, state, and federal agencies, and other service agencies such as housing and homeless service providers, libraries, substance abuse programs, mental health counseling, veterans' services commissions, educational opportunities, faith-based agencies, food, clothing, and job training and placement. County-by-county resource guides can be found online at <http://www.drc.ohio.gov/reentry-resource-guide>.

Veterans

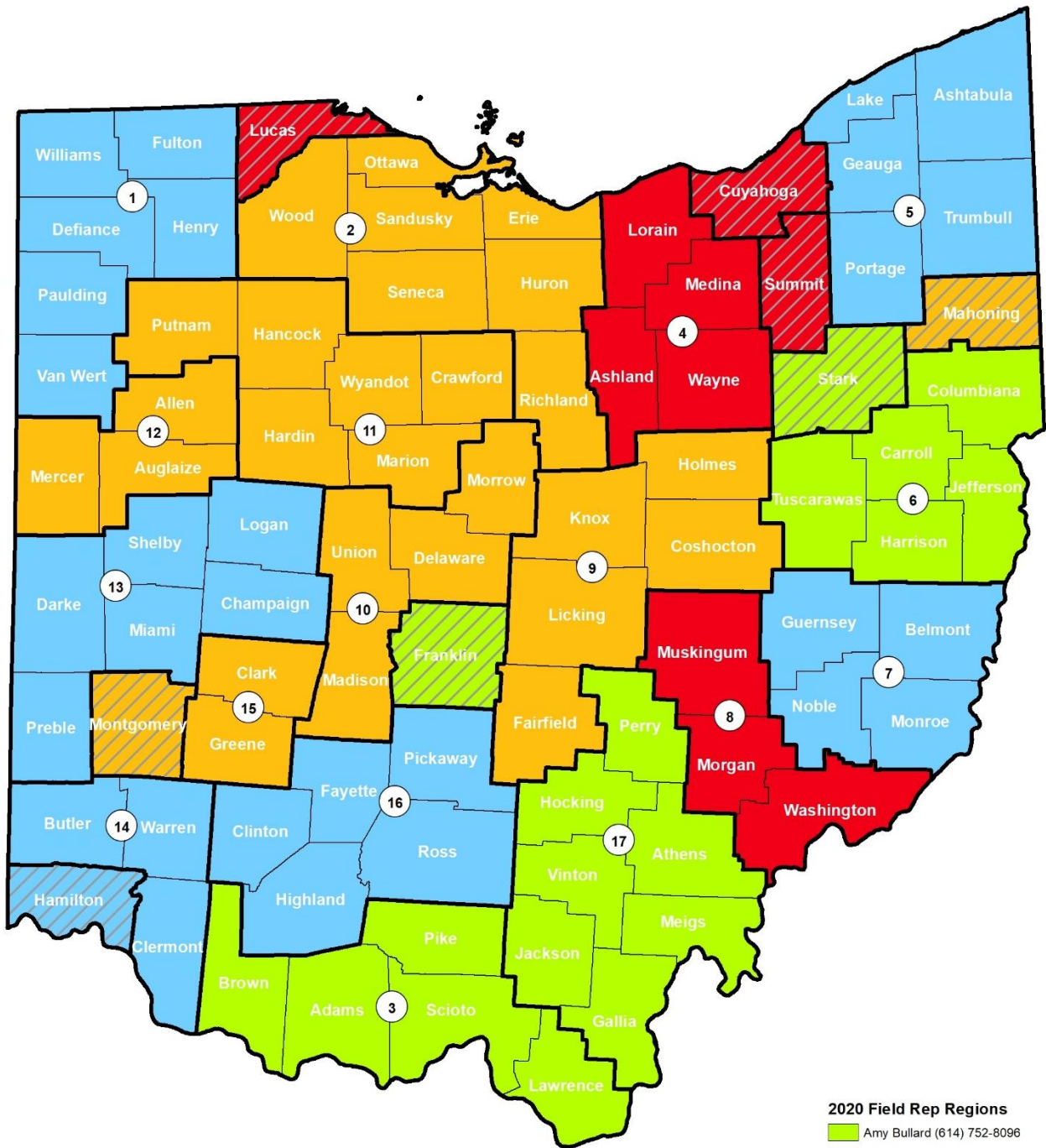
Compensated Work Therapy (CWT): Compensated Work Therapy (CWT) is VA's vocational rehabilitation program and is designed to assist Veterans experiencing homelessness and/or severe mental illness obtaining and maintaining employment. Services offered through this program include Vocational Counseling, Transitional Work Experiences (temporary job placements that normally do not exceed six months), and Supported Employment (an intensive program to help Veterans with severe employment barriers keep employment).

Veteran Justice Outreach: The purpose of the Veteran Justice Outreach (VJO) program is to help Veterans involved in the criminal justice system who are eligible for VA services and to prevent them from becoming homeless at point of release from incarceration. This program is also a part of the HCHV Outreach program.

Grant and Per Diem (GPD) Program is offered annually (as funding permits) by the VA to fund community-based agencies providing transitional housing or service centers for homeless Veterans. Volunteers of America holds the largest Grant and Per-Diem arrangement in Columbus, with 55 beds of transitional and emergency housing for homeless Veterans.

Department of Housing & Urban Development/VA Supportive Housing (HUD-VASH): The Department of Housing and Urban Development and VA Supported Housing (HUD-VASH) Program provides permanent housing and ongoing case management treatment services for homeless Veterans who require these supports to live independently. This program allows Veterans and their families to live in Veteran-selected apartment units. The vouchers are flexible, allowing Veterans to live in communities where VA case management services can be provided. This program provides for our most vulnerable Veterans, and is especially helpful to Veterans with families, women Veterans, recently returning Veterans and Veterans with disabilities.

Map 9: Homelessness and Supportive Housing Grant Manager Regions



- 2020 Field Rep Regions**
- Amy Bullard (614) 752-8096
 - Patrick Hart (614) 466-8292
 - Shannon Prince (614) 466-1809
 - Vernon McNeil (614) 644-8391
 - Entitlement Counties

Prepared by the Office of Community Development,
Community Services Division,
Ohio Development Services Agency (January 2020)

Barriers to Affordable Housing

As HUD itself noted in the March 13, 2006 regulations revising the Consolidated Plan requirements, states have less control over barrier removal than do entitlement jurisdictions. HUD cited comments by a group representing state community development agencies that it was difficult for states to meet goals for affordable housing barrier removal because states have very minimal control over the major barriers identified by HUD (zoning, local fees, etc.). Zoning and land use decision-making are an inherently local process, subject to a range of influences including market forces and citizen input.

This is certainly true in Ohio, which has a long tradition of local “home-rule” self-governance. In recognizing this reality, the OCD instead has required each of its local Allocation grantees (which cover the entire non-entitlement area of the state) to conduct a local Analysis of Impediments and devise a strategy and a schedule to address them. These analyses are required to include an assessment of local regulations and policies that may create barriers to creating or accessing affordable housing. The OCD requires communities to submit their Analysis of Impediments for review. During this year and subsequent years, communities will be offered assistance to rectify any deficiencies that the OCD staff identified in these local Analyses of Impediments.

Affirmative Marketing/Fair Housing Activities

- The OCD will continue to support developing a strong fair housing network through meetings and coordination with organizations, groups and agencies, including lenders, realtors, local fair housing administrators, state agencies and others.
- The OCD will continue to provide direct funding to support local fair housing programs through the Community Development, Community Housing Impact and Preservation and New Horizons Programs.
- The OCD will prioritize the review of shelter and supportive housing program marketing and fair housing compliance.
- Local governments’ fair housing responsibilities are described under the Local Government Certifications to the State heading.
- The OCD will provide additional emphasis on fair housing compliance related to the Community Development and CHIP Programs.
- The OCD will provide training to fair housing and housing providers on fair housing issues and specifically issues related to implementing the state’s standard fair housing program. One-on-one assistance will also be provided throughout the year.
- The OCD will continue to promote consolidating fair housing efforts and resources through establishing consortia of local government. The OCD will continue to receive and review Affirmative Marketing Plans for housing developed with five or more units. Assistance will be given to nonprofits and agencies in constructing and implementing appropriate actions. An Affirmative Marketing Handbook and Ohio Fair Housing Guide will continue to be disseminated.
- The OCD will continue to provide a funding source (i.e., the New Horizons Program) for applicants who desire to implement fair housing initiatives beyond the scope of the state’s standard fair housing program requirements. The OCD will continue to encourage communities to pool their financial and human resources in fair housing by developing a consortium of communities.
- The OCD will continue to coordinate with fair housing agencies and advocates through meetings, training, newsletters and other forms of collaboration.
- The OHFA will conduct training and educational outreach to housing providers and developers on issues related to fair housing.
- The OCD will coordinate with organizations that assist persons with disabilities (i.e. independent living centers) to identify accessible CDBG, HOME, NHTF and OHTF assisted units.
- The OCD will provide fair housing training specifically for the Community Development and CHIP Programs.
- The OCD will assist the Ohio Civil Rights Commission in holding forums on civil rights issues throughout the state.
- The OCD will hold round table discussion groups on fair housing and community development.

Other Actions Planned for 2020

Actions Planned to Address Obstacles to Meeting Underserved Needs

The State of Ohio will continue to undertake several actions during PY 2020 to meet underserved needs in the state. To ensure that statewide programs are responsive to local needs, the OCD will continue to support homeless advisory groups made up of representatives from nonprofit homeless organizations and advocacy groups from across the state. These advisory groups provide a forum for assessing the OCD programs' design and implementation. These groups are also instrumental in identifying underserved areas in the state.

Many areas of the state lack sufficient capacity to provide a continuum of care approach to homelessness in their community. The State of Ohio will continue to work with the Coalition on Homelessness and Housing in Ohio (COHHIO) to develop that capacity. Specifically, local nonprofits and communities will be provided technical assistance for developing a local continuum of care approach to homelessness. This includes assistance in assessing local needs and improving local coordination.

The OCD will also provide technical assistance to local nonprofits to increase the range of services available in underserved areas of the state. This will consist of helping nonprofit agencies develop programs that will provide services to underserved areas of the state. In addition, the OCD will continue to evaluate and fund projects based partly on the extent to which there are unmet needs in the local community.

Actions to Foster and Maintain Affordable Housing

The State of Ohio will work with other state and local agencies to address preventing foreclosures and to address the blighting influences of vacant and abandoned properties on neighborhoods. For example, funding through the Community Housing Impact and Preservation Program (HOME and CDBG) will target areas identified with the greatest need around the State of Ohio to address foreclosed, abandoned and blighted homes within these neighborhoods. The State of Ohio will also continue to address foreclosures through the Ohio Housing Finance Agency's *Save the Dream* initiative. This initiative utilizes a hotline to connect homeowners in danger of foreclosure with counselors, legal services and rescue funds to help them to avoid foreclosure.

The State of Ohio is expected to distribute about \$26 million in Housing Credits in 2020, also known as Low-Income Housing Tax Credits (LIHTC), which are allocated to both for-profit and nonprofit owners by OHFA. LIHTC projects typically target populations with incomes and rents below 60% of Area Median Income, so additional financing subsidies are often needed. The HDAP contains a separate set-aside, which offers funding solely in conjunction with the state's Housing Credit Program. This provides a more streamlined funding mechanism, so that tax credits and gap funds can be awarded through a single application process. To further expedite the reviews for funding and to assure that no project receives more subsidy than necessary, OHFA has established an application, which is used to apply for housing credits, affordable housing loans, and HDAP.

Actions to Evaluate and Reduce Lead-Based Paint Hazards

The OCD is proposing the following activities to address lead-based paint hazards during PY 2020:

- 1) In PY 2020, the OCD will require grantees to follow the Lead-Based Paint Guidelines on the next page;
- 2) The OCD has developed a chapter within its Housing Standards, the Residential Rehabilitation Standards (RRS), that addresses lead-based paint. The OCD will require all grantees undertaking housing rehabilitation activities to meet these standards;
- 3) The OCD will continue to provide funding for locally administered housing rehabilitation programs, which are expected to rehabilitate about 1,000 owner units and 125 renter units with PY 2020 funding. Housing units that undergo rehabilitation are required to be made lead safe;

- 4) The OCD will provide training and technical assistance for local program staff and local lead hazard mitigation personnel, which will include the following activities:
 - Make the Remodelers and Renovators Training Program available to contractors and workers throughout the state, and especially in areas served by the CHIP Program. The OCD will continue to use Training and Technical Assistance funds to keep the training sessions affordable to housing rehabilitation contractors.
 - Provide affordable training for Lead Risk Assessors and Lead Clearance Technicians, as needed, especially for persons who are implementing local CHIP grant activities.
 - Provide on-site technical assistance to local CHIP grantees through a third-party contractor/trainer.
 - The OCD will provide other forms of training and technical assistance support to local programs and hazard control personnel. This may include further specialized training sessions for housing program administrators, as well as preparing and distributing training materials. The OCD will continue to maintain current reference information on its website at [https://development.force.com/OCDKnowledgeArticles/s/article/Required-Grantee-Training](https://development.force.com/OCDKnowledgeArticles/s/article/Required-Grantee-Training;);
- 5) The OCD will explore other funding sources that could assist local communities, nonprofit organizations or contractors to address lead-based paint hazards. This will include coordinating efforts with the Ohio Department of Health to identify funding sources that can assist low- and moderate-income households in paying for lead hazard mitigation costs, especially in housing units where a lead hazard control order has been issued by the Ohio Department of Health. This may include applying for a HUD Lead Hazard Control Grant; and
- 6) Maintain lines of communication with federal, state and local agencies and organizations involved with the lead-based paint issues and activities, including:
 - Distributing information directly to grantees, organizations, local health departments and other organizations, as necessary.
 - Attending meetings and trainings with organizations, grantees, etc. as needed to disseminate information, discuss issues and obtain information on lead-based paint issues.
 - Staff of Development, Ohio Department of Health and the Environmental Protection Agency will continue to coordinate and communicate their policies and activities, and will work closely with HUD and other federal agency staff to keep current on regulatory requirements and issues. Development staff will attend the Lead Advisory Council meetings and participate in the Environmental Primary Prevention Workgroup.

The OCD has begun reporting the total number of units that have been made lead safe as part of the performance measurement system.

Development Lead-Based Paint Guidelines

The following guidance is provided to assist housing projects or programs using federal or state funds provided through Development.

- 1) Regardless of any information provided in these guidelines, all existing federal, state, or local laws, regulations and procedures concerning lead-based paint must be followed. Awareness and adherence to these regulations is the responsibility of the agency performing or contracting for housing rehabilitation activities. Procedures for distributing information on lead-based paint hazards, including appropriate disclosure notices, must be integrated into any and all housing-related activities.
- 2) Local communities must develop local strategies for addressing lead-based paint in housing. This strategy will need to include policy on units containing children with Elevated Blood Lead levels, which,

pursuant to the provisions of Ohio House Bill 248, requires lead hazard controls to be applied by licensed lead abatement contractors.

- 3) Except where all lead-based paint is removed, if lead hazard mitigation activities are performed on renter-occupied units financed with HUD funds or other funds covered by these policy guidelines, the owner of the units must incorporate a schedule of lead-based paint maintenance activities into regular building operations consistent with 24 CFR Part 35.935.
- 4) If state funding is used to directly assist housing projects or activities constructed prior to 1978, both state regulatory requirements and 24 CFR Part 35 must be followed. (Direct state assistance excludes state bond financing, state or federal tax-credits, and pre-development assistance, unless federal assistance is also involved.)
- 5) Agencies involved in lead-based paint hazard mitigation are encouraged to coordinate efforts with local governments, state and local health departments, Community Action Agencies, other nonprofit organizations, local housing authorities and private sector organizations wherever possible.

Actions to Reduce the Number of Poverty Level Families

In Ohio, welfare reform, known as Ohio Works First (OWF), was initiated by House Bill 408. OWF seeks to transition clients to self-sufficiency by placing a strong emphasis on obtaining and retaining paid employment. In addition to its many implications for OWF participants in terms of an emphasis on self-sufficiency through employment, new eligibility criteria and time limits, House Bill 408 contained many provisions that significantly changed the way the Ohio Department of Job and Family Services (and county agencies, particularly county Departments of Human Services) conducted business.

The ODJFS provides a seamless system for providing services to people looking for jobs and employers looking for workers. The ODJFS also collaborates with Development and the Department of Education as well as the Department of Higher Education. These agencies work directly with business and labor on workforce development activities. The ODJFS also administers the Prevention, Retention, and Contingency (PRC) Program, which is an integral part of Ohio's welfare reform efforts. Ohio's PRC Program provides work supports and other services to help low-income parents overcome immediate barriers to employment. It is funded through the federal Temporary Assistance for Needy Families program. Those receiving assistance from other public assistance programs – including Disability Financial Assistance and the Supplemental Nutrition Assistance Program, also may be eligible for PRC services. Benefits and services are available for certain low-income families who need short-term help during a crisis or time of need, which includes parents of children under 18, including noncustodial parents if they live in Ohio and pregnant women or teens. A list of PRC quarterly reports that includes both statewide and county level information can be found at <http://jfs.ohio.gov/ofs/DMRS/PRC/PRC1.stm>.

Through programs established by Development and through coordination with many of the efforts listed above, there are several systems in place to address this particular issue. The Consolidated Plan Annual Performance Report provides the number of contracts awarded to Section 3 businesses reported in the previous program year with HOME and CDBG funding, which includes contracting with businesses in low-income areas. ESG funding through the Homeless Crisis Response Program can provide financial assistance including rental assistance; rental application fees; rental arrears; security and utility deposits; utility payments; moving cost assistance and, in certain circumstances, motel and hotel vouchers. Housing Relocation and Stabilization Services, which includes case management; outreach and engagement; housing search and placement services; legal services and credit repair, are also eligible. HOPWA funding can provide limited case management, transportation and day care.

Programs and Activities That Directly Support Job Training and Development

Apart from restructuring the human services and workforce development framework, assistance will be provided to local communities through the following programs to directly support local job training, job creation, and business development.

- 1) The Ohio Works Incentive Program (OWIP) administered by ODJFS provides incentives to the local areas for job placement and retention of individuals into on-the-job training or unsubsidized employment. The goal of the program is to reduce dependency on the Ohio Works First program while strengthening Ohio's workforce. Ohio Works First recipients needing help finding a job should visit their nearest OhioMeansJobs Center. A list of centers can be found online at <http://jfs.ohio.gov/owd/wia/wiamap.stm>.
- 2) The OCD's Economic Development and Microbusiness Development Programs administered by Ohio Community Development Corporation, provide loan, grant and technical assistance to communities to create jobs which principally benefit low- and moderate- income persons (refer to the method of distribution section for a complete description of the resources that will be committed through these two programs).
- 3) Development's Office of Strategic Business Investments administers and assists local implementation of Ohio's tax incentive programs which include the Ohio Job Creation Tax Credit and InvestOhio.
- 4) The Governor's Office of Workforce Transformation (OWT) has created the Innovative Workforce Incentive Program which helps schools establish credential programs to prepare students for careers in priority industry sectors. School districts are also eligible to receive incentive dollars to implement the Innovative Workforce Incentive Program. This means schools can receive \$1,250 for each qualifying credential earned by students.
- 5) Governor's Office of Workforce Transformation has established the TechCred program which gives businesses the chance to upskill current and future employees in today's tech-infused economy. Credentials that are eligible under TechCred must be short-term, industry-recognized, and technology-focused. The state will reimburse up to \$2,000 of training upon completion of a credential.
- 6) OWT has also established the Industry Sector Partnership Grant which helps fund collaboration between businesses, education and training providers, and other community leaders who are invested in improving their region's workforce. These collaborations create a more skilled workforce and benefit both Ohioans and Ohio's job creators.

Activities to Develop Institutional Structure

Below is a listing of the training sessions that the OCD plans to provide during PY 2020. Other training and technical assistance initiatives will likely be offered in addition to those listed here, but these are the areas that the OCD will focus on during the upcoming year.

- 1) Program Application and Implementation Trainings. These will be set up by each program manager during the year as appropriate. Programs will include:
 - Community Housing Impact and Preservation (CHIP) Program
 - Economic Development Program
 - Target of Opportunity Grant Program (CDBG)
 - Residential Public Infrastructure Grant Program
 - Allocation Program
 - Neighborhood Revitalization Grants
- 2) Training in support of Lead-Based Paint Hazard Control:
 - Lead-Safe Renovation (Renovators and Remodelers Training Program)
 - Lead Inspector/Risk Assessor Training

- Lead Inspector/Risk Assessor Training Refresher
 - Lead Supervisor/ Contractor Training
 - Lead Supervisor/Contractor Training Refresher
 - On-site Technical Assistance
 - EPA Renovation and Remodeling Refresher four-hour update training for those who have previously attended *Lead Safe Renovation Training*. Successful completion of this training qualifies as certification in the EPA RRP training which is required for all contractors as of May 2010.
- 3) The OCD will partner with agencies to provide comprehensive fair housing training.
- 4) The OCD will continue to provide funds to statewide and regional nonprofits to act as intermediaries that can help groups through program design, provide direct technical assistance and help with fundraising strategies. It is anticipated that the following groups will apply for the funds:
- Ohio Community Development Corporation Association
 - Coalition on Homelessness and Housing in Ohio
 - Corporation for Ohio Appalachian Development
 - Heritage Ohio, Inc.
 - Ohio Conference of Community Development
- 5) The OCD will continue to offer training and technical assistance by providing funding to intermediary organizations to conduct training and technical assistance activities. Training and technical assistance support may include the following subjects:
- Building nonprofit organization staff's basic and intermediate skills in designing and developing projects.
 - Training and technical assistance for local microenterprise programs.
 - Training on establishing and operating Individual Development Accounts (IDAs).
 - Training for developing and implementing Community Economic Development (CED) strategies.
 - Training and technical assistance for downtown development programs.
 - Training and technical assistance for supportive housing programs.
 - Training and technical assistance on housing development in Ohio's Appalachian area.
 - Training to develop capacity to implement housing development projects.
 - Continue to provide training on the National Main Street approach for extended technical assistance to the Ohio Main Street Communities.
 - Continue to provide technical assistance to grantees and applicants for the OCD Comprehensive Downtown Revitalization Program through Downtown Assessment Resource Team (DART) visits and community visits as requested.
 - Heritage Ohio will conduct workshops and an Annual Conference.
 - COHHIO will continue to assist with implementing and evaluating the HCRP Program
 - COHHIO will conduct workshops and trainings to increase administrative capacity of agencies that provide assistance to the homeless and near homeless.
- 6) The OCD will continue to develop its Technical Assistance website to include reference and resource material related to program implementation, management and compliance.
- 7) The OCD will conduct environmental review training.
- 8) The OCD will develop a revised training for persons who are new to implementing CDBG, HOME, and supportive housing programs.
- 9) The OCD will conduct training on technical issues related to construction, national objectives, procurement, construction management, planning and innovative project designs.

- 10) The OCD will continue to work with Ohio Conference of Community Development, Inc. to provide training recommended by its membership.

Addressing the Needs of Public Housing

Neither the State of Ohio nor any of its agencies are designated as a public housing authority, nor do they administer public housing units. These functions are performed by local public housing authorities within the state. Insofar as the state can determine and as indicated on HUD's website, there are currently no troubled housing authorities in the State of Ohio. The state does not administer public housing units or oversee housing authorities, but as the civil rights compliance regulations are the same as the OCD housing program regulations, the OCD is able to provide direct technical assistance to these agencies upon request. It is not clear what resources the state could provide to assist a troubled public housing authority, especially prior to an agency being designated as such. Should a public housing authority be designated as "troubled", the state would attempt to provide support to the agency with technical assistance.

Actions Planned to Enhance Coordination between Public and Private Housing and Social Service Agencies

The programs and activities that will be carried out by the OCD over the next year will involve coordination with several agencies and organizations, many of which are identified below, along with a description of the type of coordination that will take place.

Planned Interagency Coordination for PY 2020

Balance of State Continuum of Care Committee: Statewide homeless policies and services will be coordinated through the committee. The committee will assist in preparing the Ohio Balance of State Continuum of Care application to HUD.

Heritage Ohio, Inc. (HOI): The OCD staff will attend the HOI meetings to exchange information to help facilitate implementing the OCD's Downtown Revitalization Grants Program. HOI is a recipient of a Training and Technical Assistance grant and works with the OCD to provide assistance to small communities interested in downtown revitalization activities.

Ohio Department of Mental Health and Addiction Services (OhioMHAS): Representatives from OhioMHAS will participate in planning and reviewing the Homeless Crisis Response Program, Supportive Housing Program and balance of state Continuum of Care applications. OhioMHAS will also assist in marketing and providing technical assistance to any of the OCD/ OhioMHAS-affiliated organization interested in applying for the OHTF Housing Assistance Grant Program funds. Representatives also advise OHFA on providing rental housing and necessary services for its population.

Ohio Association of Community Action Agencies (OACAA): The OCD will continue to work with OACAA and its member agencies, especially by drawing upon the expertise and knowledge of CAA staff to administer and implement programs funded through the OCD.

Ohio Conference of Community Development (OCCD): The OCD and OCCD co-sponsor conferences to benefit all Ohio communities. OCCD's State Program Committee reviews OCD programs and policies, and the State Program Training Committee coordinates training issues and activities with the OCD.

Ohio Department of Health (ODH): The OCD will coordinate its lead-based paint activities with staff of ODH, which will include training, housing and policy development. The OCD will also coordinate with the ODH on developing and implementing a statewide Healthy Home/Housing plan.

Community Development Finance Fund (CDFF): The OCD will coordinate efforts with the CDFF to provide both pre-development and project financing to nonprofit organizations.

Ohio CDC Association: The OCD will coordinate efforts with the CDC Association on the microenterprise program, nonprofit housing and other related activities. OHFA works with the CDC Association on operating support for CHDOs and funding awards through HDAP.

Coalition on Homelessness and Housing in Ohio (COHHIO): The OCD staff will coordinate efforts with COHHIO relative to training, programs and activities relative to homelessness and housing. COHHIO will participate in preparing the state's Continuum of Care application. A representative of COHHIO also serves on the OHFA housing credit advisory committee.

Ohio Civil Rights Commission (OCRC): The OCD's fair housing coordinator will work with staff of the Ohio Civil Rights Commission to address issues of mutual concern relative to civil rights and fair housing.

Ohio Historic Preservation Office (OHPO): The OCD staff will coordinate with the OHPO staff in addressing historic preservation issues that arise relative to housing, economic and community development projects, as well as providing training on preservation issues and procedures.

Homeless Management Information System (HMIS): The OCD will work with providers and COHHIO on effectively implementing the balance of state's HMIS. The major focus will be on increasing participants' data quality and developing a better reporting capacity.

Ohio Capital Corporation for Housing (OCCH): The OCD staff will coordinate with OCCH to market and provide a series of housing development trainings throughout the state. OHFA works with OCCH regarding developing the housing credit program.

Corporation for Ohio Appalachian Development (COAD): The OCD will coordinate with COAD to provide training on lead-safe housing rehabilitation procedures to reduce lead hazards existing in low- and moderate-income housing stock.

ACTION Ohio: The OCD staff serves on the board of this statewide coalition against domestic violence, advocating for victims, survivors and their families.

Ohio Statewide Independent Living Council (SILC): The OCD staff will work with SILC to promote equal access and full inclusion and integration of individuals with disabilities into the mainstream society.

Housing Production Goals for 2020

The following two tables indicate the estimated housing production goals for 2020. Table 5 indicates the number of housing units or households that will receive assistance during the upcoming year, and Table 6 indicates HOPWA production goals. These figures are based on historical production; actual outcomes may vary. The households provided with affordable housing include all households assisted with CDBG, ESG (HP and RRH activities) and HOME funds. The goals for providing permanent housing for homeless persons and families are integrated into the Continuum of Care actions steps.

Table 5: Housing Goals for 2020

One Year Goal for the Number of Households to be Supported	Annual Estimated Production
Homeless	400
Non-Homeless	850
Special Needs	150
Total=	1,400
One Year Goal for the Number of Household Housing Units Supported	Annual Estimated Production
Renter Assistance	750

Production of New Units	250
Rehab of Existing Units	400
Acquisition of Existing Units	0
Total	1,400

Table 6: HOPWA Production Goals for 2020

Category	Annual Goals
Short term rent, mortgage and utility assistance payments	290
Tenant Based Rental Assistance	45
Units provided in transitional housing facilities developed, leased, or operated with HOPWA funds	85
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	0
Total	420

Annual Goals and Objectives

	Goal Name	Needs Addressed	Goal Outcome Indicator
<p>The following Annual Goals and Objectives were developed as part of the PY 2020 – 2024 Consolidated Plan submitted to HUD in IDIS.</p> <p>Though a great deal of “output” measurement data (number of units, linear feet, etc.) is reported to HUD annually, HUD is looking for “outcome” data that shows how HUD programs impact communities.</p> <p>Recently, HUD developed, as part of the eCon Planning Suite, a prescribed method to report accomplishments based on funding sources to meet the five-year strategic goals. The Annual Goals and Objectives are selected from a limited number of Goal Outcomes Indicators and Units of Measurements, thus the measurements that are currently reported differ from the previously reported performance measures in that they are not as specific. The following are the Annual Goals and Objectives for PY 2020:Sort Order</p>			

1	Homelessness Prevention/Rapid Rehousing	Homeless individuals and families	Tenant-based rental assistance / Rapid Rehousing: 500 Households Assisted Homelessness Prevention: 200 Persons Assisted
3	Emergency Shelter Operations	Homeless individuals and families	Homeless Person Overnight Shelter: 10000 Persons Assisted
4	Housing & Supportive Services for HIV/AIDS Clients	Homeless individuals and families Housing preservation and accessibility Supportive housing/fair housing special needs	HIV/AIDS Housing Operations: 800 Household Housing Unit
7	Housing Rehabilitation	Housing preservation and accessibility Affordable housing	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 350 Household Housing Unit
9	Housing Repair	Housing preservation and accessibility Affordable housing	Rental units rehabilitated: 40 Household Housing Unit Homeowner Housing Rehabilitated: 500 Household Housing Unit
11	Housing Assistance (TBRA and Homeownership)	Affordable housing	Direct Financial Assistance to Homebuyers: 10 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 150 Households Assisted
13	New Housing Construction	Affordable housing	Rental units constructed: 200 Household Housing Unit Homeowner Housing Added: 20 Household Housing Unit
18	Community Development Infrastructure/Facilities	Community development facilities/infrastructure	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200000 Persons Assisted Buildings Demolished: 10 Buildings
19	Community Development Public Services	Community development public services	Public service activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted
20	Economic Development	Economic development	Jobs created/retained: 100 Jobs Businesses assisted: 5 Businesses Assisted
21	Fair Housing	Supportive housing/fair housing special needs	Other: 100 Other
22	Training and Technical Assistance	Training technical assistance/capacity building	Businesses assisted: 200 Businesses Assisted
23	Administration	Administration	Other: 1 Other

Monitoring

The OCD conducts monitoring visits at least once prior to grant close out. Also, both the OCD and OHFA staff provide technical assistance to CHIP and HDAP grantees, either via telephone, meetings at the state offices, or, if warranted, via site visits. Most post-award, on-site technical assistance is provided to CHIP grantees, whose programs sometimes involve activities that are new to the local program or involve new local staff. HDAP grants are for projects, rather than programs, and are typically implemented by agencies that have considerable housing development experience. Thus, there is not a significant need for on-site, post-award technical assistance in most HDAP projects. The Community Investments Section also meets with CDBG Allocation grantees before application submission to ensure eligibility and national objective compliance. Generally, OCD staff conducts a minimum of 30 monitoring/technical assistance visits during the program year (July 1 – June 30). Also, on a calendar year basis, Development's Office of Audit conducts financial audits of selected grant recipients. The OCD provides the Office of Audit with a selected list determined by each section supervisor based on grant size, grant and program complexity. The Office of Audit adds several recipients based on random selection of receipts and grant disbursements.

Monitoring Procedures

Monitoring visits examine some selected activities to determine that:

- 1) Activities meet the OCD, state and/or HUD requirements.
- 2) Communities are timely and responsibly managing projects.
- 3) Communities are implementing activities outlined in the application and grant agreement.

The visit is not intended to be a comprehensive, in-depth audit of all activities and programs undertaken by the grantee, nor do staff resources permit such an approach. Site visits are selected based on empirical evidence reviewed by management and community development/housing specialists regarding grantees' expertise, program complexity or number of grants operated by a particular recipient. The staff will monitor certain programmatic areas based on previous findings in that specific area or if the particular programmatic function has not been monitored in the past few years.

If the initial review by an OCD staff member uncovers specific problem areas, a program specialist (financial, procurement, acquisition/relocation, etc.) will be sent to conduct a detailed review of a particular program area.

After a monitoring visit, the OCD staff person must conduct an exit conference with the grantee to review the monitoring results and describe any deficiencies found during the monitoring visit. Within 45 days following a monitoring visit, the OCD staff person prepares a monitoring report that the section supervisor reviews. All monitoring tools and work papers must be placed in the Central File. Grantees have 30 days to respond to the monitoring report and are required to respond if a "finding" is listed in the report.

A computerized monitoring tracking system enables the OCD staff to quickly determine problem areas and/or grantees that need monitoring as well as tracking to ensure that all grants are monitored prior to close out.

Monitoring Standards

There are two types of determinations that can be made because of a monitoring visit:

A "Finding" is a deficiency that is a direct law/regulation or grant agreement violation (which incorporates the application documents and attendant commitments). A "finding" can also include insufficient documentation that substantiates the grantee followed grant or statutory requirements. All "findings" require the grantee to respond to and rectify the cited deficiency.

An "Advisory Concern" is not a violation but is any deficiency that may eventually lead to a violation and "finding". It is the OCD staff person's responsibility to track the outstanding "findings" and advisory concerns. If the grantee has not responded within the appropriate time, OCD must contact the grantee in writing with

follow-up letters until all issues are resolved. Once all issues are resolved, the OCD will send the grantee a written release.

Program-Specific Requirements

HOME Program Homeownership Assistance - Resale/Recapture

Some of the HOME assistance may be provided through homeownership assistance. To ensure affordability, the HOME program requires an affordability period based on the amount of HOME assistance. Under resale and recapture provisions, the family must own and continue to occupy the home as its principal residence throughout the affordability period. Grantees must enforce the resale or recapture requirement if the property is sold or title is transferred.

Failure to comply with the resale or recapture requirements means that 1) the original HOME-assisted homebuyer no longer occupies the unit as his or her principal residence (i.e., unit is rented or vacant), or 2) the home was sold during the affordability period and the applicable resale or recapture provisions were not enforced. In cases of noncompliance under either resale or recapture provisions, the Grantee must repay to the State of Ohio for remittance to the HOME Investment Trust Fund in accordance with 24 CFR §92.503(b), any *outstanding HOME funds* invested in the housing. The amount subject to repayment is the total amount of HOME funds invested in the housing (i.e., any HOME development subsidy to the developer plus any HOME down-payment or other assistance (e.g., closing costs) provided to the homebuyer) minus any HOME funds already repaid (i.e., payment of principal on a HOME loan). Any interest paid on the loan is considered program income and cannot be counted against the outstanding HOME investment amount. *Note that noncompliance with principal residency requirements by a homebuyer under a recapture provision is not a transfer. Consequently, the amount the Grantee must repay is not subject to prorated or other reductions included in its recapture provisions.*

The Grantee must repay the HOME investment in accordance with 24 CFR §92.503(b)(3) whether it is able to recover any portion of the HOME investment from the noncompliant homebuyer. Therefore, it is crucial for the Grantee to have enforcement mechanisms in its written agreements with homebuyers to protect its investment and minimize its risk in HOME-assisted homebuyer projects in the event the homebuyer is in noncompliance. There are two options regarding reselling homebuyer properties during the affordability period. Option 1, recapture, must be used in all cases, except for projects completed by Habitat for Humanity. Projects completed by Habitat for Humanity must use Option 2, resale. The specific requirements for Option 1 and Option 2 are as follows:

Option 1 – Create another Unit by “Recapturing” the HOME Investment

- Under a recapture provision, the homebuyer may sell the unit at any time during the affordability period, at any price the market will bear, to any buyer, and all or a portion of the direct HOME subsidy will be recaptured upon transfer of the unit as described below.
- Recapture provisions will be based on the Reduction During Affordability Period model. Recapture provisions allow the grantee to reduce the amount of direct HOME subsidy to be recaptured on a pro-rata basis for the time the homebuyer has owned and occupied the housing, measured against the required affordability period. The amount subject to recapture will decline in equal increments, on an annual basis over the affordability period term or until the assisted housing is sold or otherwise transferred. The resulting ratio would be used to determine how much of the direct HOME subsidy the grantee would recapture. The pro rata amount recaptured by the grantee cannot exceed what is available from net proceeds. Net proceeds are defined as the sales price minus the superior loan repayment, other than HOME funds, and any closing costs.
- Recaptured HOME assistance must be used to assist other low-income HOME beneficiaries.
- HOME funds subject to recapture include any direct assistance to the homebuyer that reduced the purchase price from fair market value to an affordable price or any down payment or subordinate financing provided on behalf of the purchase, but excludes the amount between unit production cost and the property's market value (i.e. development subsidy). There must be an amount subject to recapture for a recapture provision to be used; otherwise, resale will apply.

Option 2 – Sell the Existing Property to a Subsequent Low-Income (80% of AMI) Purchaser

- Resale requirements must ensure that the home will be sold to a low-income family and the property will continue to be used as a principal residence for the remainder of the affordability period.
- For the housing to remain affordable, the subsequent purchaser’s monthly payments of principal, interest, taxes and insurance cannot exceed 30% of the gross income for a family with an income between 30 and 80% of median income for the area.
- Deed restrictions or other similar mechanisms must be used to guarantee the resale restrictions, 24 CFR 92.254.
- Resale provisions – In the event of foreclosure, the subsequent low-income owner will inherit the remainder of the affordability period. If not purchased by a low-income owner, the project will be considered non-compliant, and the Grantee must repay any *outstanding HOME funds* invested in the project for subsequent repayment to the HOME Investment Trust Fund.
- Under the resale option, the affordability period is based on the total amount of HOME funds invested in the housing, including any development subsidy.
- Under the resale option, grantees must ensure that, if the property is sold during the affordability period, the price at resale provides the original HOME-assisted homebuyer a fair return on investment. Grantees shall determine the fair return on investment by using the following calculation:
- The original homebuyer’s initial investment (i.e., any down payment), plus any investment in capital improvements made by the original homebuyer that may add value to the property. This total shall then be multiplied by the percentage change in the Consumer Price Index (CPI) over the period of ownership to determine a fair rate of return for the original buyer. This fair rate of return is then added to the owner’s initial investment and any applicable investment in capital improvements. The total amount shall be considered as the homebuyer’s fair return on investment.

Note: Capital improvements are defined as improvements made to the home that are outside of general maintenance items. Actual costs of capital improvements must be documented by the original homeowner’s receipts for materials and labor. If the resale price necessary to provide fair return is not affordable to the subsequent buyer, additional HOME funds may be invested in the project. The investment of additional HOME funds will require that a new affordability period be established.

The affordability period is based on the amount of HOME funds provided as direct assistance for the recapture option or total amount of HOME funds for resale option. The following table must be used for determining the affordability period for homeownership activities:

Assistance per Unit or Buyer	Length of the Affordability Period
\$1,000* - \$14,999	5 years
\$15,000 - \$40,000	10 years
More than \$40,000	15 years

Affirmative Marketing Policy

State recipients and sub-recipients receiving HOME funds shall adopt policies and procedures that inform the public, potential tenants and property owners of its Affirmative Marketing Policy. At a minimum, a state recipient’s Affirmative Marketing Policy must commit to include the Equal Housing Opportunity logotype in press releases and solicitations for participation in the HOME Program. The state recipient will also have a policy for referring questions and complaints to an agency or organization that can provide advice on federal

housing laws. At least once annually, state recipients will conduct a public outreach effort that will make information available to the public on rental units that have received HOME assistance. Minimally, this information will include the unit addresses, unit types and the owner's address and phone number.

At a minimum, the Affirmative Marketing Policy will require that project owners of five or more units receiving HOME assistance will comply with the following requirements:

- 1) After receiving HOME assistance and throughout the affordability period, the owner shall annually provide information on HOME-assisted units to an agency that serves LMI persons.
- 2) If any units are publicly advertised during the affordability period, the Equal Opportunity Housing logo must accompany the advertisement.
- 3) The owner must display the Equal Housing Opportunity logo and fair housing poster in a publicly accessible area (e.g., the rental office).
- 4) The owner will maintain information on tenants' race, sex and ethnicity to demonstrate the owner's affirmative marketing efforts results.
- 5) The owner will, for the affordability period, maintain information demonstrating compliance with sections 1, 2 and 4 above, and will make such information available to the state recipient, sub-recipient or the state of Ohio upon request.

Each recipient or sub-recipient shall maintain records indicating compliance with the above policies, including:

- 1) Records documenting the recipient's annual outreach efforts to Affirmatively Market HOME-assisted units. The state (or state recipients in decentralized programs) will conduct an annual evaluation of the effectiveness of these efforts. Minimally, this evaluation shall include a discussion with the organizations or agencies identified in section 1 above as to the number of referrals made based on the information provided by the HOME-assisted units' owners.

The evaluation may also include a review of the information maintained pursuant to section 4 above to review the tenant population characteristics for specific projects;

- 2) HOME-assisted unit owners monitoring records (to be maintained by the recipient or sub-recipient) that indicate the extent to which the owner has complied with sections 1, 2, 3, 4 and 5 above, and remedies to resolve non-compliance.

Policies of the Office of Community Development

City Status

For purposes of the federal programs administered under this Consolidated Plan, municipalities that attain city status must provide city designation evidence from the Ohio Secretary of State by January 1st of the year of the effective date of the Consolidated Plan.

CDBG

Program Income

Under Section 104(j) of the Housing and Community Development Act of 1974, as amended, states are authorized to distribute program income when such income has been returned from local communities.

The State of Ohio CDBG Program guidelines are such that most program income derived from administering local grantee funds stays at the community level. Local grantees must expend their program income according to Policy Notice 15-04, Program Income (<https://development.force.com/OCDKnowledgeArticles/s/article/15-04-Program-Income-Policy>). Any program income returned to the state, due to the community's unsatisfactory compliance with statutory and regulatory requirements, will be distributed to eligible CDBG programs at the OCD's discretion, based on program need and timeliness requirements.

If a local grantee community lacks the capacity to administer program income, any income that the community receives as result of a grant activity (and which is governed by HUD or federal program income regulations) must be returned to the state.

Program income may be retained by the unit of general local government if the program income will be used to continue the activity from which the program income was derived. The state will determine when an activity will be continued. Funds expended in a different manner must receive prior state approval.

Smaller units of government that do not have an ongoing grant relationship with the OCD, or an existing Economic Development Revolving Loan Fund, will be required to arrange Revolving Loan Fund agreements with the county in which the community is located.

Recaptured Funds

Based on past experience, the state expects to recapture CDBG funds from local grantees for the following reasons:

- 1) questioned costs;
- 2) unallowable costs;
- 3) unspent funds, or funds not drawn down by local grantees after local program completion; and
- 4) funding commitments for local projects that do not begin within allowable time periods.

At the OCD's discretion, recaptured funds will be transferred to the appropriate program and distributed to meet timeliness requirements.

Program Set-Aside Fund Balance

Unless otherwise provided in the state Consolidated Plan and at the OCD's discretion, program set-aside funds remaining at the end of the Program Year will be transferred to the appropriate program to meet timeliness requirements.

HOME Program Income

The OCD will allow local governments to maintain and expend HOME program income on the OCD-approved, HOME-eligible activities. However, program income funds must be expended before a grantee may receive additional HOME dollars to expend on a similar activity.

In addition, the OCD will allow grantees to expend up to 10% of HOME program income expected to be received in a calendar year for administrative expenses directly related to managing those funds. Grantees are required to report to the OCD on program income annually.

The OCD requires communities that administer CDBG or HOME program income through a local Revolving Loan Fund (RLF) to submit their RLF Administration Agreements to the OCD every three years for review and approval.

Reallocated Funds

The state does not expect to receive any reallocated funds HUD recaptured from Small Cities grantees during the upcoming year.

Undistributed Funds

If it appears likely that funds allocated to the state's programs will not be distributed within the allotted timeframe for the program, the state reserves the right to transfer all programs' undistributed balance to other programs that need additional funding. At the OCD's discretion, funds set aside for the Economic Development Program that are not substantially committed to specific projects by April 30th, will be transferred to the appropriate program to meet timeliness requirements. Funds allocated for the Residential Public Infrastructure Grant Program that are not committed to specific projects by May 31st will be transferred to the Community Development Program. Undistributed CHDO Operating Grant Program funds will be transferred to the CHIP Program.

Use of Funds for Technical Assistance

The state reserves its right to use up to 1% of each annual allocation it receives from HUD to provide technical assistance to local units of government and other entities and individuals eligible for assistance under the State CDBG Program.

Waiver of Plan Requirements

Should two units of local government be unable to establish or maintain a mutually satisfactory working relationship regarding administering the CDBG Allocation or Economic Development Programs, one or both units of government may request that the OCD waive the requirements of the applicable portion of the state plan. The unit of local government requesting a waiver shall present, in writing, documented attempts to comply with the administration plan, the reasons why compliance is not possible and submit to the OCD a waiver request signed by the chief local elected official. Only cities designated as "Acquired Cities" are eligible for a waiver under the Allocation Program.

Upon receipt of a written waiver request, the OCD shall take the following steps:

- 1) Investigate the issues;
- 2) Hold at least one meeting with representatives of both units of local government to try to resolve the issues; and
- 3) Make a determination within 15 working days from the receipt of a written waiver request.

A waiver shall be granted only if:

- 1) The OCD is satisfied that all reasonable attempts have been made to comply with the plan's requirements;
- 2) The OCD determines that some unusual or unique circumstances exist that prevents the grantees from meeting the CDBG administration plan requirements; and
- 3) Granting a waiver would best achieve the plan's objective.

Should the units of government not agree with the OCD's determination, they may request, in writing, that the Chief of the Community Services Division review the waiver request and make a decision within 10 working days.

Amendment Policy

The OCD Amendment Policy is available in Policy Notice 18-01, Grant Operations and Financial Management Policy. Program specific details on the amendment policy are available in the program sections of this Annual Action Plan.

Community-Based Alternatives for Individuals with Disabilities

In *Olmstead v. L.C.*, 527 U.S. 581 (1999) (the "Olmstead decision"), the Supreme Court construed Title II of the ADA to require qualified individuals with mental disabilities be placed in community settings, rather than in institutions, whenever treatment professionals determine that such placement is appropriate, and the affected persons do not oppose such placement, considering the resources available and the needs of others with disabilities. The state will support localities' efforts to help people who are institutionalized to have the opportunity to live close to their families and friends, to live more independently, to engage in productive employment and to participate in community life.

The state will support strategies and policies that foster independence and participation in the community for all individuals with disabilities who are served by programs and activities assisted with funding distributed through the Ohio Consolidated Plan.

The state will not support disability-based discrimination in services, programs, or activities. However, the state will allow grantees to assist housing and provide programs and services that benefit specific disability subgroups when it is documented that there is an unmet need for the housing, services or programs.

Preferences for Persons with Disabilities

The state permits grantees to develop client selection criteria that serve the entire community but give a preference to persons with a special need(s).

Special needs preferences may target a specific category of individuals with disabilities (e.g., persons with HIV/AIDS or chronic mental illness) if the specific category is identified in the Consolidated and Local Plans as having unmet housing needs and the preference is required to narrow the gap in benefits and services received by such persons. However, if a grantee prefers persons within a class or category of disability (such as persons with HIV/AIDS or chronic mental illness), the grantee cannot discriminate against persons who fall within that class based on the presence of other disabilities. The local written selection criteria must explain what the preferences are and how the preferences will be implemented.

All programs and activities are subject to the applicable fair housing requirements, and preferences must be administered in a nondiscriminatory manner. This means that if a special needs preference is established, grantees or sub-recipients must affirmatively market activity availability across all protected classes within the preference.

When a grantee chooses to serve a particular group of persons with a specialized housing activity or program, the grantee cannot then restrict access to its other activities for the identified group. For example, a grantee may not determine that since it will provide a preference to persons with special needs under its TBRA

program, it will therefore limit participation by those special needs persons in its homeownership or other affordable housing programs or forms of assistance.

When combining programs, grantees must keep in mind that the rules and regulations of all programs must be met.

Minority and Women's Business Outreach

The OCD requires that recipients or sub-recipients of state-administered HUD assistance take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5), above.

Development provides several assistance programs for minority-owned businesses. The Minority Development Financing Advisory Board (MDFAB) assists the Development Services Agency in creating employment opportunities and wealth in the minority business community. The Minority Development Financing Advisory Board does this by reviewing and making recommendations on loans and surety bond requests. . In addition, Development's Minority Business Development Division supports the growth and sustainability of small, minority, and disadvantaged businesses in Ohio through Minority Business Assistance Centers (MBAC). The Division works with entrepreneurs and emerging business enterprises to help them achieve scale and market success. The goal is to help small, minority, and disadvantaged businesses contribute to job creation and economic growth in Ohio.

The seven MBACs serve clients in areas with the highest minority population concentrations including Akron, Cincinnati, Cleveland, Columbus, Dayton, Toledo and Youngstown. Professional MBAC staff work with owners of existing businesses, start-ups, certified Minority Business Enterprises (MBEs), certified Encouraging Diversity Growth and Equity (EDGE) and socially and economically disadvantaged businesses. Services provided to minority-owned businesses include accounting assistance, business management counseling, completing federal, state, and local certification applications, contract procurement assistance, estimating/bidding assistance, identifying local resources, loan packaging assistance, marketing plan development, and referrals to financial assistance programs.

The MBE programs provided through Development conduct their own outreach and marketing efforts and will provide these resources to businesses interested in participating in the CDBG or HOME programs.

Local Government Certifications

Title I, Section 106, of the Housing and Community Development Act of 1974, as amended, requires that no amount may be distributed by the state under the CDBG program to any unit of general local government in a non-entitlement area unless such unit of general local government certifies that:

- 1) It will minimize displacement of persons because of activities assisted with such amounts;

- 2) Its program will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d et seq.) and the Fair Housing Act (42 USC 3601-20), and that it will affirmatively further fair housing;
- 3) It is following a detailed citizen participation plan which:
 - (a) provides for and encourages citizen participation, with particular emphasis on participation by persons of low- and moderate-income who are residents of slum and blight areas and of areas in which section 106 funds are proposed to be used, and in the case of a grantee described in section 106(a), provides for residents in low- and moderate-income neighborhoods' participation as defined by the local jurisdiction;
 - (b) provides citizens with reasonable and timely access to local meetings, information and records relating to the grantee's proposed use of funds, as required by Secretary's regulations, and relating to the actual funds under this title;
 - (c) provides for technical assistance to groups representing persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
 - (d) provides for public hearings to obtain citizen views and respond to proposals and questions at all stages of the community development program, including at least developing needs, reviewing proposed activities, and reviewing program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the disabled;
 - (e) provides for a timely written answer within 15 working days, where practicable, to written complaints and grievances; and
 - (f) identifies how non-English speaking residents' needs will be met in at public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. This paragraph may not be construed to restrict the grantee's responsibility or authority for developing and executing its community development program.
- 4) It will not attempt to recover any public improvement capital costs assisted in whole or in part under Section 106 or with amounts resulting from a guarantee under Section 108 by assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (i) funds received under Section 106 are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from resources other than under this title; or (ii) for purposes of assessing any amount against properties owned and occupied by persons of low- and moderate-income, the grantee certified to the state it lacks sufficient funds received under Section 106 to comply with the requirements of clause (i);
- 5) To receive Title I funds, it will adopt and enforce a policy prohibiting using excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and enforcing applicable state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstration within its jurisdiction; and
- 6) The chief executive officer of the unit of general local government certifies, to the best of his or her knowledge and belief, that:
 - (a) No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a

Member of Congress in connection with the awarding of any federal Contract, the making of any federal grant or loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment or modification of any federal contract, grant loan or cooperative agreement;

- (b) If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress or an employee of a Member of Congress relating to this federal contract, grant, loan or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure of Lobbying Activities," in accordance with its instructions;
- (c) The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants and contracts under grants, loans and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly; and,
- (d) The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants and contracts under grants, loans and cooperative agreements) and that all sub-recipients shall certify and disclose accordingly.

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

The program certifications, which are listed above, will be contained in the grant agreement between the state and units of general local government receiving CDBG funds. At the time of grant agreement execution, grantees are also required to sign these certifications and to ensure that the requirements are met during the implementation of the grantees' program activities.

Title I of the Housing and Community Development Act of 1974, as referenced at 24 CFR 570.487(b), requires each unit of general local government that participates in the CDBG Program to certify that it will affirmatively further fair housing. The certification is included in each grant agreement with the state. Similar fair housing strategies are required if the unit of general local government participates in the HOME Investment Partnerships Program (24 CFR 92.350 and 351).

Units of general local government that receive CDBG or HOME funds are required to develop and conduct activities to promote nondiscrimination in public and private housing transactions.

To comply with the certification:

- 1) Standard Fair Housing Program Requirements for Local Government CDBG and HOME Recipients
 - (a) Conduct or update an analysis of impediments to fair housing choice (AI). The AI should identify policies, actions, omissions, or decisions that restrict housing choice based on race, color, religion, sex, national origin, disability, familial status, ancestry and military status. The AI should describe impediments to fair housing choice and include, at a minimum, jurisdictional background data and maps, a summary of fair housing complaints within the jurisdiction and a plan of action – with a timetable – to address identified impediments. The AI must be updated annually. If an applicant jurisdiction is not covered by an existing, OCD-approved AI, the unit of general local government must submit an AI within three months of a CDBG- or HOME-funded award.

- (b) Appoint a local fair housing coordinator who is an employee of the unit of general local government and will generally be accessible Monday through Friday. A qualified consultant or local agency may serve as the local fair housing coordinator, upon the OCD's written approval. The local fair housing coordinator's name, address and phone number must appear in all fair housing materials and on the grantee's official website.
- (c) Establish and implement a process to receive fair housing complaints and refer cases to the Ohio Civil Rights Commission, which is charged with investigation and enforcement. Records must describe the type of referral, copies of Housing Discrimination Complaint records (HUD-903 or equivalent), referral date and any follow-up action.
- (d) Design a fair housing training program that includes presentations to:
 - (i) Residents of areas in which CDBG or HOME activities are being undertaken, or to special populations affected by the activities;
 - (ii) A minimum of three civic groups, organizations, or schools (per calendar year during the grant period);
 - (iii) Participants in homebuyer education programs associated with Homeownership Assistance activities; and
 - (iv) Property owners who participate in rental repair/rehabilitation projects.

Records for each training session must contain an agenda, sign-in sheet, minutes and a description of the audience.

- (e) Develop and distribute fair housing information and materials (e.g. posters, pamphlets, brochures or other informational materials) to a minimum of 10 area agencies, organizations, or public events (e.g. county fair, post office, employment services office, etc.) quarterly throughout the grant period. A Community Development Allocation recipient that also receives a Community Housing Impact and Preservation (CHIP) Program award must include five additional area agencies, organizations or public events in its distribution strategy. The local fair housing coordinator's telephone number (including a telephone number for the hearing impaired) must be included on all outreach materials. Records regarding the outreach strategy must include distribution locations, dates and a description of the type and quantity of distributed materials. If a unit of general local government undertakes residential rehabilitation/repair, residential new construction, tenant-based rental assistance or down payment assistance, it must provide fair housing information to each program applicant.

Units of general local government must submit Standard Fair Housing Program proposals to the OCD for review and approval. Following the OCD approval of a Standard Fair Housing Program plan, grantees must submit any proposed modifications to the OCD for review.

- 2) Units of general local government undertaking CDBG- or HOME-assisted multifamily rehabilitation projects containing five or more units must adopt affirmative marketing procedures and submit an Affirmative Fair Housing Marketing Plan (AFHMP) to the OCD for review.
- 3) Units of general local government may undertake additional actions to affirmatively further fair housing beyond those required to meet the certification. Possible additional, voluntary actions include, but are not limited to:
 - (a) Adopt a local fair housing ordinance or resolution. The resolution or ordinance must include coverage for all protected classes listed in the Fair Housing Act and Ohio fair housing law: race, color, religion, sex, national origin, disability, familial status, ancestry, and military status.
 - (b) Provide housing discrimination investigation services (testing).
 - (c) Review local real estate advertisements for discriminatory language. Provide local publishers, real estate firms and banks with fair housing advertising guidelines.

- (d) Sponsor community fair housing awareness events, such as poster, speech and writing contests.
- (e) Develop lists of both public and private housing accessible to persons with disabilities.
- (f) Review local zoning laws and procedures to determine whether they contribute to or detract from fair housing choice.

Grantee Assurances to the State

The Grantee through grant agreement execution will provide assurance and certify that they will follow all applicable federal regulations as required by the federal funding sources.

PY 2021 Citizen Participation Plan (24 CFR Part 91.115)

(a)1. Applicability and Adoption of the Citizen Participation Plan

The Ohio Development Services Agency (Development) Community Service Division's Office of Community Development (OCD) is the state agency responsible for administering all the programs funded through the U.S Department of Housing and Urban Development (HUD), including the:

- Community Development Block Grant (CDBG) Program
- HOME Investment Partnerships (HOME) Program
- Emergency Solutions Grant (ESG) Program
- Housing Opportunities for Persons with AIDS (HOPWA) Program
- National Housing Trust Fund (NHTF)

These four programs and NHTF are required to be covered by a Consolidated Plan (including an Annual Action Plan and a five-year Strategic Plan), and the Citizen Participation requirements described at 24 CFR 91.115. This description of the state's Citizen Participation Plan for Program Year 2021, which will occur from July 1, 2021 through June 30, 2022, establishes the processes and procedures the OCD will follow to solicit citizen participation in the planning process. The planning process will take place prior to the PY 2021 Consolidated Plan's July 1, 2021 effective date.

(a)2. Encouragement of Citizen Participation

Because of Ohio's size and diversity, the OCD will provide opportunities for comment on the Consolidated Plan through a variety of strategies, as follows:

1. The OCD will send notice of the availability of the PY 2019 Annual Performance Report to all Allocation Program recipients, as well as PY 2021 nonprofit grantees. This document will be available online at http://development.ohio.gov/cs/cs_ ocp.htm for reference in local public hearings. Local communities receiving comments will be asked to forward any comments to the OCD, which will provide these comments to the advisory committee members during the planning process.
2. A notice about the draft PY 2021 Ohio Consolidated Plan and Executive Summary's availability and the notice of available auxiliary aids will be distributed to local communities and organizations for comment during the 30-day public comment period. The plan documents will be posted online at http://development.ohio.gov/cs/cs_ ocp.htm with copies available upon request, as well as in the OCD office.
3. Each Allocation Program and Community Housing Impact and Preservation (CHIP) Program grant recipient is required to follow a citizen participation process that involves holding a local public hearing on funding resource availability, developing a needs statement and must develop local plans to address identified needs, as discussed in paragraph (e) below. This mechanism will provide for local citizen involvement in the state's planning process.

(a)3. Citizen and Local Government Comment on the Citizen Participation Plan Amendments.

The PY 2021 Citizen Participation Plan and Amendment Policy will be made available for comment by local communities and the general public. It will be distributed with the PY 2021 Consolidated Plan (see (a)(2) above) during both the public comment period and after the plan is approved.

This will allow for comment on both the draft plan document and the proposed planning process for the following year.

(b) Development of the Consolidated Plan

Preparing the Consolidated Plan will be the result of using an open consultation and citizen participation process that will involve internal work groups, external advisory committees, public hearings/meetings, notice publication online at http://development.ohio.gov/cs/cs_ocp.htm, and consideration of written and oral comments. The overall process is described in detail below. (Note that specific dates cannot be given at this point but will be identified prior to the public hearing and comment notification process.)

The first step in the planning process will be preparing the PY 2019 Consolidated Plan Annual Performance Report and the Performance Evaluation Report, a draft of which will be made available to the public for review and comment on September 1, 2020 with final submission to the HUD area office on or about September 25, 2020. Notification of the Annual Report's availability will be made through the Public Hearing on Needs notification.

On or about September 10, 2020, a Public Hearing on Needs Issues will be held with the location to be determined. The Public Hearing on Needs notification will be directly emailed to approximately 900 local communities, organizations and agencies throughout the state and published online at http://development.ohio.gov/cs/cs_ocp.htm. The notification will also summarize the state's planning process for the Consolidated Plan and will solicit participation in the OCD's Program Advisory Committee meetings.

Additionally, throughout the year, the OCD staff will meet with the State Programs Committee of the Ohio Conference of Community Development (OCCD), which convenes quarterly to discuss topics and issues related to community development. OCCD's membership includes many local community development agencies, as well as other organizations and people involved with housing and community development. The OCD staff will also meet with other government agencies and organizations during PY 2021 to discuss various issues related to the Consolidated Plan. These meetings may well result in identifying additional issues and recommendations that will also be included in the PY 2021 planning process.

For two days on or about November 12, 2020, the OCD will host a series of meetings with the Program Advisory Committees. The committees will consist of no less than 10 local governments, agencies and organizations representatives who have been involved with the OCD and OHFA programs. Participation in the committee meetings will be open to the public, insofar as space is available, although the OCD may specifically invite organizations and agencies to attend to ensure a range of interests and perspectives is represented and participate in the process.

The Program Advisory Committee meetings will be held to discuss and receive input on how these programs are being administered at the state and local levels, how well fund expenditures are meeting local communities' identified needs, especially LMI families and individuals, and ways to improve all program administration and service delivery areas. After reviewing past program accomplishments and current status, the advisory groups will make recommendations on PY 2021 programs, from application requirements and project review criteria, to training and technical assistance, funding levels and program guidelines and requirements. The Program Advisory Committees are listed in the Advisory Committee Guidelines. Minutes of the Program Advisory Committees will be posted to the Development's website, maintained in the PY 2021 Consolidated Plan records, and copies of the minutes will be mailed to each of the respective Program Advisory Committees. Based on the Program Advisory Committees' recommendations and comments received by the OCD, the OCD will prepare a draft PY 2021 Consolidated Plan.

After revisions to the draft PY 2021 Consolidated Plan are completed, it will be posted along with the Executive Summary on or about March 1, 2021, to the Development website at http://development.ohio.gov/cs/cs_ocp.htm. Posting notification will be sent to local governments, agencies and organizations to provide them with an opportunity for review and comment. Hard copies of the plan will be provided upon request. The notification of the draft Consolidated Plan's availability will mark the beginning of the 30-day public comment period, which will end on or about March 31, 2021. On or about March 16, 2021, approximately two weeks after the 30-day public comment period begins, the OCD will hold a Public Hearing on the draft PY 2021 Ohio Consolidated Plan. Both oral and written comments will be accepted at the hearing. The public hearing location is to be determined at a later date. Notification of the Public Comment period, Public Hearing and the PY 2021 draft plan's availability will be accomplished through direct emailing to local communities and organizations, and by posting online at http://development.ohio.gov/cs/cs_ocp.htm. After the Public Hearing and the end of the comment process, the OCD will consider all comments and recommendations, and make final revisions to the plan document. The OCD will prepare responses to all comments submitted on the draft PY 2021 Consolidated Plan.

The OCD will submit the Plan to the Director's office for review and signature by the Director, or a designated representative. The PY 2021 Ohio Consolidated Plan Annual Action Plan and Consolidated Plan will then be submitted via the Integrated Disbursement and Information Systems (IDIS) website to the Columbus Area Office of the U.S. Department of Housing and Urban Development (HUD) on or about May 13, 2021, for the required 45-day review period. Upon Plan approval by HUD, the final PY 2021 Ohio Consolidated Plan and the Executive Summary will be posted on the Development website at http://development.ohio.gov/cs/cs_ocp.htm, and notification of such posting will be sent to local governments, organizations and individuals. Hard copies will be made available to the general public upon request.

(c) Amendment Policy

Minor budgetary revisions to the Consolidated Plan, which are defined as changes that do not exceed 10% of the original budget amount, will not constitute a substantial amendment and will be made without a public hearing or notification. However, changes to existing distribution methods or program guidelines as stated in the plan document, new program initiatives or budgetary changes more than 10% of the original budget amount will be considered a substantial amendment and will be required to go through a formal amendment process. The OCD will hold a public hearing on such an amendment and will provide notification of the proposed amendment at least 30 calendar days prior to the public hearing. The notice will summarize the nature of the proposed amendment, the public hearing date, time and location and procedures for submitting comments. The state may either make this notification by (1) publishing a notice in several general circulation newspapers within the state or (2) directly transmitting a notice to local governments, agencies or organizations affected by the amendment. In the event the latter method is chosen exclusively, local Allocation grantees and/or local libraries will be requested to post notice of the proposed amendment. The notice will also be posted to Development's website. Within five business days after the public comment period, the OCD will determine whether to adopt the proposed amendment, a revised version of the amendment or reject the amendment. The determination will be posted to the Development website. If the amendment is adopted, the change will be incorporated into the Consolidated Plan, along with a summary of comments on the amendment and the OCD's response to such comments.

(d) Performance Reports

The OCD will prepare the PY 2019 Annual Performance Report and make it available for public comment and review 15 days prior to submission to HUD, which must occur no later than 90 days after the end of the state's PY 2019, which will occur on June 30, 2020. The notification and hearing process is described under section (b) above.

(e) Citizen Participation Requirements for Local Governments

Units of general local government that receive CDBG funds from the state must adopt and follow a written local citizen participation plan which:

- Provides for and encourages citizen participation, with particular emphasis on participation by persons of low- and moderate-income who are residents of slum and blighted areas and of areas in which Section 106 funds are proposed to be used, and in the case of a grantee described in Section 106(a), provides for participation of residents in low- and moderate-income neighborhoods as defined by the local jurisdiction;
- Provides citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, as required by regulations of the Secretary, and relating to the actual funds under this title; provides citizens with reasonable and timely access to local meetings, information and records relating to the grantee's proposed use;
- Provides for technical assistance to groups representing persons of low- and moderate-income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
- Provides for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least developing needs and reviewing proposed activities and program performance, which hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the disabled;
- Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable; and
- Identifies how the needs of non-English speaking residents will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. This paragraph may not be construed to restrict the grantee's responsibility or authority for the developing and executing its community development program.

(f) Availability to the Public

Upon HUD approval, the PY 2021 Ohio Consolidated Plan Annual Action Plan, substantial amendments and the PY 2021 Ohio Consolidated Plan Annual Action Plan Executive Summary and PY 2019 Annual Performance Report will be available to the public upon request. Copies of the Consolidated Plan will remain on Development's website for both the current and previous years. Request for copies of these documents may be made by phone, email or in writing to:

Office of Community Development
 Riffe Center, 26th Floor
 77 South High Street
 Columbus, Ohio 43215
 Phone: (614) 466-2285
conplan@development.ohio.gov

(g) Access to Records

The OCD will provide citizens, public agencies and other interested parties with reasonable and timely written access to information and records relating to the state's Consolidated Plan and the state's use of this assistance under the programs covered by this Citizen Participation Plan during the preceding five years. Records pertaining to projects funded within the previous five years can be made available within 24-hours of written notice specifying which records for which access is being requested. Such notification must be sent to:

Deputy Chief
 Office of Community Development
 Riffe Center, 26th floor
 77 South High Street
 Columbus, Ohio 43215

(h) Comments and Complaints

The PY 2021 Ohio Consolidated Annual Action Plan will include a summary of comments or views made in conjunction with the Consolidated Plan or process, the Plan's amendment or the Annual Report, as received by the OCD in writing or orally at public hearings or during public comment periods during the planning process.

The OCD will respond to written complaints within 15 working days of receiving such a complaint if the complaint is made in conjunction with programs covered by this Citizen Participation Plan.

If the state receives a written complaint that is made about a program or project that is administered by a sub-grantee community, the OCD will refer the complaint to the local grantee community along with a transmittal letter from the OCD, copied to the complainant. The local grantee community will be required to respond to the complainant in writing (with a copy of the response sent to the OCD) within 15 days of the date of the OCD's transmittal letter. The OCD will work with the community and the complainant to ensure that the issue is resolved to the mutual satisfaction of the parties involved, and that applicable program regulations are followed.

(i) Use of Citizen Participation Plan

The state shall follow and document compliance with this Citizen Participation Plan.

(j) 2020-2024 Consolidated Plan Needs Assessment and Strategy

The OCD has submitted the PY 2020 – 2024 Ohio Consolidated Plan Needs Assessment and Strategy to HUD Ohio in May 2020 for approval. The state is required to submit statistical and analytical information that provides an overall picture of the state's housing, homeless and community development needs. The information will assist in establishing priorities and allocating federal and state resources, principally for extremely low-, low-, and moderate-income families. The information will also be used for developing specific objectives in accordance with the statutory goals of providing decent housing, a suitable living environment and expanding economic opportunities. The needs information must be sufficient to support the state's strategic plan, including its priorities for allocating resources, specific objectives and strategy for achieving desired results.

The state drew on relevant information from previous submissions and other reports and studies, as appropriate. The process also relied on citizen input, as well as consultations with local governments, state and federal government agencies, nonprofit organizations and social service agencies to obtain information on housing needs and the needs of children, elderly persons, persons with disabilities, homeless persons and other persons served by such agencies.

The state produced a strategic plan that brought the needs and resources together in a coordinated housing and community development strategy. The strategic plan identified expected accomplishments and results the state hopes to achieve in terms of outputs and outcomes. The state plan was developed to achieve the following goals and objectives, principally for low-, very low- and extremely low-income residents:

- provide decent housing
- create suitable living environments
- expand economic opportunities

The Consolidated Plan Annual Action Plan citizen participation and planning process was used to solicit comments and input on developing the needs assessment and strategy, however special meetings occurred in order to deal with specific topics and issues. The OCD established an e-committee to gather input obtained through surveys and by using electronic media and communication. The final version of the PY 2020–2024 Ohio Consolidated Plan Needs Assessment and Strategy will be made available on the Development website at http://development.ohio.gov/cs/cs_ocp.html/.

The OCD Consolidated Plan Program Advisory Committee Guidelines

The following guidelines will pertain to the advisory committees' composition and function, established in conjunction with preparing the Consolidated Plan Annual Action Plan.

1. The OCD will annually establish the following Program Advisory Committees:
 - Community Development Program/Residential Public Infrastructure Program Advisory Committee/Economic Development and Public Infrastructure Program Advisory Committee
 - Community Housing Impact and Preservation Program/Housing Assistance Grant Program Advisory Committee
 - Housing Development Assistance Program Advisory Committee
 - New Horizons/Fair Housing Program Advisory Committee
 - Homeless Crisis Response Program /Supportive Housing Grant Program Advisory Committee
 - Housing Opportunities for Persons with AIDS Program Advisory Committee

Each committee will consist of at least 10 members selected by the OCD.

Acronym Listing

AMI	Area Median Income
ARC	Appalachia Regional Commission
CDBG	Community Development Block Grant Program
CDC	Community Development Corporation
CSD	Community Services Division
CDFE	Community Development Finance Fund
CHDO	Community Housing Development Organization
CHIP	Community Housing Impact and Preservation
COAD	Corporation for Ohio Appalachian Development
COHHIO	Coalition on Homelessness and Housing in Ohio
ESG	Emergency Solutions Grant Program
FEMA	Federal Emergency Management Agency
FFY	Federal Fiscal Year
GOA	Governor's Office of Appalachia
HOPWA	Housing Opportunities for Persons with AIDS (HOPWA)
HOME	HOME Investment Partnerships Program
HUD	U.S. Department of Housing and Urban Development
IDIS	Integrated Disbursement and Information Systems
LIHTC	Low-Income Housing Tax Credit
LMI	Low- and Moderate-Income
OCA	Office of Community Assistance, Ohio Development Services Agency
OCD	Office of Community Development, Ohio Development Services Agency
ODA	Ohio Department of Aging
ODE	Ohio Department of Education
OhioMHAS	Ohio Department of Mental Health and Addiction Services
ODJFS	Ohio Department of Job and Family Services
ODODD	Ohio Department of Developmental Disabilities
ODNR	Ohio Department of Natural Resources
ODSA	Ohio Development Services Agency
ODOT	Ohio Department of Transportation

OEPA	Ohio Environmental Protection Agency
OHFA	Ohio Housing Finance Agency
OHTF	Ohio Housing Trust Fund
OSDC	Ohio Statewide Development Corporation
OPWC	Ohio Public Works Commission
OWDA	Ohio Water Development Authority
OWT	Governor's Office of Workforce Transformation
PATH	Projects for Assistance in Transition from Homelessness (OhioMHAS)
PJ	Participating Jurisdiction (HOME Program)
PY	Program Year
RLF	Revolving Loan Fund
SBA-504	Small Business Administration, 504 Loan Program
SBA-7A	Small Business Administration, 7(A) Loan Guaranty Program
SFY	State Fiscal Year

Attachments

Attachment A:

Additional Resources for Housing, Homeless and Supportive Services*

Agency	Program	Beneficiary Type					Activity Type							
		Owner	Home-buyer	Renter	Home-less	Special Needs(1)	Acquire Only	New Const.	Rehabilitation	Weatherization/Repair	Transitional Hsg.	Homeless Prevention	Rental Asst.	Support Services
OHFA	Housing Development Loan Program	x		x			x	x	x					
Ohio Dept. of Aging	Resident Service Coordinator Program			x		x								x
OHFA	Housing Credit Program			x				x	x		x			
OHFA	Single Family Mortgage Revenue Bond Program		x				x							
OHFA	Mortgage Credit Certificate Program		x				x							
OCA	Home Weatherization	x		x						x				
OCA	Home Energy Assistance Program	x		x										x
ODA	Home Repair and Modification Program	x							x					
OCS	Community Services Block Grant				x							x		x
United Way					x							x		x
FEMA	Emergency Food and Shelter Program				x							x		
ODE	Education of Homeless Youths				x							x		x
ODJFS	Title 20				x									x

Agency	Program	Beneficiary Type					Activity Type							
		Owner	Home-buyer	Renter	Home-less	Special Needs(1)	Acquire Only	New Const.	Rehabilitation	Weatherization/Repair	Transitional Hsg.	Homeless Prevention	Rental Asst.	Support Services
ODOOD	Community Capital Assistance Grants				x	x	x		x			x		
ODOOD	Supported Living Program				x	x						x	x	x
ODOOD	Purchase of Service				x	x						x		x
ODMHAS	Community Capital Funding Program					x	x	x						
ODMHAS	Residential Services Program				x	x						x		x
ODMH	PATH Program				x	x						x		x
CDFP	Linked Deposit Program	x		x			x	x	x					
CDFP	Pre-Development Program	x		x			x	x	x					
USDARD	Section 502 Single Family Housing - Direct		x				x	x						
USDARD	Guaranteed Rural Housing		x				x	x						
USDARD	Section 504 Rural Housing Loans and Grants	x							x					
USDARD	Section 515 Rural Rental Housing			x				x	x					
USDARD	Section 533 Housing Preservation Grants	x							x					
Ohio Dept. of Health	Ryan White					x						x		x
ODADAS	HUD Homeless Assistance HUD Homeless Assistance 1996 Continuum of Care						x							x

(1) Special Needs Persons are non-homeless, and may include frail elderly persons, persons with AIDS, and disabled families.

Note: Resources include funds provided through state and federal agencies and foundations.

The non-OCD funds listed have been significantly utilized by OCD grantees. There are funds utilized by OCD grantees that are not listed on this matrix.

Additional Resources for Economic Development*

Agency	Program	Geography	Activity Type				Financing Type	
			Machinery & Equipment	New Construction	Rehabilitation	Infrastructure	Training & Tech. Support	Tax Credit / Abatement
ODSA	Road Work Development Fund - 629 Account	Statewide				x		
ODSA	Enterprise Zones	State Enterprise Zones					x	
ODSA	166 Loan Program	Statewide	x	x	x			x
ODSA	166 Regional Loan Program	Statewide	x	x	x			x
ODSA	Business Development - 412 Program	Statewide	x			x		x
ODSA	Ohio Enterprise Bond Fund	Statewide	x	x	x			x
OSDC	Small Business Admin. 504 Loan Program	Statewide	x	x	x			x
OSDC	Small Business Admin. 7(A) Loan Guaranty	Statewide	x	X	x			x
EDA	Economic Development Grant Programs	Statewide		x	x	x	x	x
GOA	Appalachia Regional Commission	Appalachian Counties		x	x	x	x	x
USDARD	Rural Business Enterprise Grants	Rural Areas/Cities < 50,000	x	x		x	x	x
USDARD	Business & Industrial Guaranteed Loans	Rural Areas/Cities < 50,000	x					x
USDARD	Intermediary Relending Program	Rural Areas < 25,000	x	x	x	x	x	x
OWDA	Issue 2	Statewide				x		x
ODOT	Various Programs	Statewide				x		x

(1) Note: There is a maximum amount of funds that may be used for Training & Technical Support activities.

Note: Resources include funds provided through federal agencies and other state agencies.

The non-OCD funds listed have been significantly utilized by OCD grantees. There are funds utilized by OCD grantees that are not listed on this matrix.

Additional Resources for Community Development*

Agency*	Program	Eligible Geographic Area	Activity Type						
			Public Facilities				Community Facilities	Private Rehabilitation	Public Services
			Streets	Water & Sewer	Flood & Drainage	Other			
USDARD	Community Facility Guaranteed Loans	Small Towns/Rural Areas	x			x	x		
USDARD	Community Facility Loans	Small Towns/Rural Areas	x			x	x		
USDARD	Water & Waste Disposal Loans & Grants	Small Towns/Rural Areas		x					
USDARD	Solid Waste Management Grants	Small Towns/Rural Areas		x					
USDARD	Water & Waste Disposal	Small Towns/Rural Areas		x					
OWDA & OEPA	Ohio Water Pollution Control Loan Fund	Statewide		x		x			
OWDA	Construction Loans	Statewide		x					
OWDA	Planning Loans	Statewide		x					
OWDA & OEPA	OWDA Two Percent Hardship Drinking Water Loans	Statewide		x					
OEPA	Municipal Wastewater Assistance Program	Statewide		x					
ODNR	Grant and Loan Programs	Statewide		x	x	x		x	
OPWC	State Capital Improvements Program (Issue 2)	Statewide	x	x	x	x			
OPWC	Local Transportation Improvements Program (Issue 2)	Statewide	x						
GOA	Appalachia Regional Commission	Appalachian Counties	x	x	x	x	x	x	
ODOT	Various Programs	Statewide	x						

Note: Resources include funds provided through federal agencies and other state agencies.

The non-OCD funds listed have been significantly utilized by OCD grantees. There are funds utilized by OCD grantees that are not listed on this matrix.

Attachment B:



**Development
Services Agency**

Amended PY 2020 Annual Action Plan Executive Summary

July 2020

Prepared By:
Ohio Development Services Agency
Community Services Division
Office of Community Development

Mike DeWine, Governor of Ohio
Jon Husted, Lt. Governor
Lydia L. Mihalik, Director
Ohio Development Services Agency

Program Year (PY) 2020 Ohio Consolidated Plan Annual Action Plan Summary of Proposed Revisions

Community Housing Impact and Preservation (CHIP) Program

OCD proposes the following changes for PY 2020:

Eligible Project Categories with Respective Activities:

The following OCD Limits of Assistance for eligible activities have been increased as follows:

- **Owner Rehabilitation Assistance** – OCD Maximum Per Unit Limit of Assistance has been increased from \$46,000 to \$64,000 (including soft costs)
- **Rental Rehabilitation Assistance** – OCD Maximum Per Unit Limit of Assistance has been increased from \$46,000 to \$64,000 (including soft costs)
- **Owner Repair Assistance** – OCD Maximum Per Unit Limit of Assistance has been increased from \$15,000 to \$18,000 (including soft costs)
- **Rental Repair Assistance** – OCD Per Unit Limit of Assistance has been increased from \$15,000 to \$18,000 (including soft costs)
- **Homeownership Assistance** – OCD Maximum Per Unit Limit of Assistance has been increased from \$47,000 to \$65,000 (including soft costs)
- **New Construction** – OCD Maximum Per Unit Limit of Assistance has been increased from \$22,000 to \$30,000 (including soft costs not exceeding 10 percent of CHIP hard costs)

The application deadline has been moved to June 24, 2020.

Housing Assistance Grant Program

OCD proposes the following changes for PY 2020:

Maximum Award Amounts:

This section has been updated as follows: “Agencies currently participating in the Housing Assistance Grant Program are eligible to apply for an amount equal to their last Housing Assistance Grant Program award, unless they can demonstrate an increased need for funding based on program expansion, increased utilization of the program, etc. Applicants for programs that have not previously been funded under this program should contact the Office of Community Development for guidance in determining an appropriate request amount. Development reserves the right to make awards at levels less than requested. Awards will be based on available funding, service area, population served, community need, and cost reasonableness as detailed in the rating criteria.”

Rating Criteria:

- The total amount of points that can be awarded for Need has been decreased from 15 points to 10 points.
- The total amount of points that can be awarded for Project Design/Outcomes has been increased from 15 points to 20 points.

Housing Development Assistance Program

OCD proposes the following changes for PY 2020:

Funding Requirements for All HDAP Awards:

- The language indicating that developments that have previously received an award may not be eligible to receive additional funds has been removed.

Loans:

OHTF/HOME:

- The Mark-to-Market program language has been removed from this section as this program is no longer included as part of the HDAP program for Section 8 projects.

Programs:

Housing Development Gap Financing (HDGF) - *Funding Limit:*

- The total maximum request for project amount has been removed with award amounts now based on funding availability and the needs of the project.

Bond Gap Financing (BGF) - Funding Limit:

- The total maximum request for Bond Gap Financing project amount has been removed with award amounts now based on funding availability and the needs of the project

Fees:

The amount that OHFA may elect to impose for each amendment or extension has been reduced from \$500 to \$100.

The National Housing Trust Fund Allocation funding amount has been included as n HDAP funding source.

CHDO Operating Grant Program

There are no major changes proposed for PY 2020.

Homeless Crisis Response Program

The OCD proposes the following changes for PY 2020:

Funding Method:

Projects will now be funded at the amount currently funded for a two-year period with up to an increase of five percent, based on funding levels.

Rating Criteria:

A competitive scoring system will not be used since the distribution of funds is now an allocation process.

The application deadline has been moved to July 23, 2020.

Supportive Housing Program

The OCD proposes the following changes for PY 2020:

Funding Method:

Projects will now be funded at the amount currently funded for a two-year period with up to an increase of five percent, based on funding levels.

Rating Criteria:

A competitive scoring system will not be used since the distribution of funds is now an allocation process.

The application deadline has been moved to August 20, 2020.

Housing Opportunities for Persons with AIDS Program

There are no major changes proposed for PY 2020.

Community Development Program

The OCD proposes the following changes for PY 2020:

Application Guidelines:

- The following language with regards to the number of awards that a community may have open at a time, as well as, the number of competitive set-aside applications that a community can apply for has been revised:
 - Cities may apply for up to two Critical Infrastructure program awards annually.
 - Counties may apply for up to three Critical Infrastructure program awards annually.
 - Cities may have one and counties may have up to two Neighborhood Revitalization program awards open at a time.
 - Both cities and counties may have up to three Critical Infrastructure open at a time.

Application Guidelines:

- A project cannot be included in multiple competitive set-aside or open cycle program applications. Previously this was only limited to projects included in multiple competitive set-aside applications.

Rating System Principles:

- The Critical Infrastructure thresholds sections has been updated to include the Ohio EPA and Permit to Install/Plan Approval requirement. If applicable, project design must be completed prior to application submission. Applicants submitting projects requiring Ohio Environmental Protection Agency (EPA) review and approval must provide documentation of the Ohio EPA's approval and Permit to Install with the application.
- The points awarded for applications have been adjusted as follows:
 - Distress points have been reduced from 30 points to 10 points.
 - The Leverage category has been replaced by the Implementation and Administrative Capacity category with the total amount of points that can be awarded increased from 10 to 15 points.
 - The Program Design category has been updated with the total amount of points increased from 60 points to 75 points.

Allocation Program

Planning Activities:

- The language requiring communities with RLF accounts to use RLF funds to undertake proposed planning activities has been removed.

Public Service Activities:

- There is not a cap on the percent of funds requested for PY 2020 public service activities.

Number of Projects:

- Dedicated cities funded at the \$150,000 level will be allowed a maximum of 4 projects. These projects are not factored in to the county of jurisdiction's cap as outlined above.

Neighborhood Revitalization Grants

There are no major changes being proposed for PY 2020.

Critical Infrastructure Grants

Ineligible Activities:

- Applicants must contact OCD for guidance on program selection prior to submitting a letter of interest for water or sanitary sewer projects with a total project cost in excess of \$600,000.

Local Program Period:

- OCD will start accepting letters of interest May 1, 2019. The letter of interest form is available on the OCD's Technical Assistance website. The OCD will initiate the full application in OCEAN and notify the community of its availability when a letter of interest is accepted. Full applications will be accepted on an open-cycle basis from June 1, 2019, until April 30, 2020, or until such time the OCD expends available funding. The OCD will review applications in rounds designated by funding availability.

Rating System Principles:

- The Critical Infrastructure thresholds sections has been updated to include the Ohio EPA and Permit to Install/Plan Approval requirement. If applicable, project design must be completed prior to application submission. Applicants submitting projects requiring Ohio Environmental Protection Agency (EPA) review and approval must provide documentation of the Ohio EPA's approval and Permit to Install with the application.
- The points awarded for applications have been adjusted as follows:
 - Distress points have been reduced from 30 points to 10 points.
 - The Leverage category has been replaced by the Implementation and Administrative Capacity category with the total amount of points that can be awarded increased from 10 to 15 points.
 - The Program Design category has been updated with the total amount of points increased from 60 points to 75 points.

Economic Development Loan and Public Infrastructure Grant Program

The OCD proposes the following changes for PY 2020:

Economic Development Loan Program

The OCD proposes the following changes for PY 2020:

Closing Binder:

- Legal agreements between the awarded local government and beneficiary business must be included in the closing binder.

Economic Development Working Capital Loan Program

The OCD proposes the following changes for PY 2020:

The Economic Development Working Capital Loan Program established program to provide working capital on a community-wide basis for COVID19-impacted businesses. Projects must create and retain permanent, private-sector jobs, principally for low- and moderate-income persons, through retaining business and industry in Ohio communities.

Economic Development Public Infrastructure Grant Program

The OCD proposes the following changes for PY 2020:

Closing Binder:

- Legal agreements between the awarded local government and beneficiary business must be included in the closing binder.

Residential Public Infrastructure Grant Program

The OCD proposes the following changes for PY 2020:

Grant Ceiling:

- The cap for on-site improvements has been increased from \$100,000 to \$200,000 with a waiver being permitted to exceed that amount.
- One amendment will now be permitted to move funds between public construction and on-site improvements as needed.

Grant Floor:

- Applicants must contact OCD for guidance on program selection prior to submitting a letter of interest for water or sanitary sewer projects with a total project cost of less than \$600,000.

Rating System Principles:

- Under Program Impact, communities with documented lead water distribution lines will also be given priority. Points will now also be awarded for secondary standards violations and functionally obsolete systems.

Target of Opportunity Grant Programs

CDBG Economic and Community Development Target of Opportunity Program

The OCD proposes the following changes for PY 2020:

The following activities have been included as eligible activities:

- Planning, including feasibility studies for property redevelopment, asset management, and resilience/mitigation
- Public services, including but not limited to; child care, services for victims of domestic violence, down payment assistance, drug abuse counseling and treatment, education, emergency assistance payment, energy conservation counseling and testing, health care, homeless services, job training, legal services, public safety, recreation, senior services, and transportation.

Downtown Revitalization Target of Opportunity Program

The OCD proposes the following changes for PY 2020:

Program Investment Area:

- For Spot Slum and Blight projects, the signed statement or resolution must be accompanied by a Building Conditions Form that details the substandard condition of the property to be rehabilitated.

New Horizons Fair Housing Assistance Program

There are no major changes proposed for PY 2020.

Ohio Housing Trust Fund (OHTF) Special Projects Grant Program

There are no major changes proposed for PY 2020.

Emergency Shelter Target of Opportunity Program Grants

The OCD proposes the following changes for PY 2020:

- The total amount of Ohio Housing Trust Fund funds now available for the Emergency Shelter per year has been increased from \$100,000 to \$200,000.

Program Year (PY) 2020 – 2024 Ohio Consolidated Plan Summary of Revisions

The PY 2020-2024 Consolidated Plan is an examination of needs and issues affecting Ohio communities and citizens, particularly those of low- and moderate-income. The strategy also establishes goals, objectives, and priorities for addressing identified needs with resources provided through HUD. The strategy is based upon the expectation that the needs will remain basically the same over the next five years and that HUD resources will be maintained at or about their current level. Should that not be the case, then the strategy will need to be revised accordingly. The PY 2020-2024 Consolidated Plan Strategy will guide Development in preparing Ohio's Consolidated Plan annual action plans, which contain the specific distribution method of HUD funds for the upcoming year.

The Consolidated Plan Needs Assessment and Strategy is divided into three parts:

- **Needs Assessment**
- **Market Analysis**
- **Strategic Plan**

All sections have been updated based on current such as data provided by the U.S. Census Bureau, feedback received from the public as part of the citizen participation process outlined previously and published reports from various state agencies.

The PY 2020-2024 Consolidated Plan Strategic Plan establishes goals, objectives, and priorities for addressing identified needs with resources provided from HUD. The strategy is based upon the expectation that the needs will remain basically the same over the next five years and that HUD resources will be maintained at or about their current level. Should these resources change, the strategy will need to be revised accordingly. The PY 2020-2024 Consolidated Plan Strategy will guide the preparation of Ohio's Consolidated Plan annual action plans, which contain the specific method of distribution of HUD funds for the upcoming year. The Strategic Plan is divided into the following updated sections:

Goals and Objectives

The following Goals and Objectives were developed as part of the PY 2020 – 2024 Consolidated Plan submitted to HUD in IDIS. Though a great deal of “output” measurement data (number of units, linear feet, etc.) is reported to HUD annually, HUD is looking for “outcome” data that shows how HUD programs impact communities. Recently, HUD developed, as part of the eCon Planning Suite, a prescribed method to report accomplishments based on funding sources to meet the five-year strategic goals. The Annual Goals and Objectives are selected from a limited number of Goal Outcomes Indicators and Units of Measurements, thus the measurements that are currently reported differ from the previously reported performance measures in that they are not as specific.

Sort Order	Goal Name	Needs Addressed	Goal Outcome Indicator
1	Homelessness Prevention/Rapid Rehousing	Homeless individuals and families	Tenant-based rental assistance / Rapid Rehousing: 500 Households Assisted Homelessness Prevention: 200 Persons Assisted
3	Emergency Shelter Operations	Homeless individuals and families	Homeless Person Overnight Shelter: 10000 Persons Assisted
4	Housing & Supportive Services for HIV/AIDS Clients	Homeless individuals and families Housing preservation and accessibility Supportive housing/fair housing special needs	HIV/AIDS Housing Operations: 800 Household Housing Unit
7	Housing Rehabilitation	Housing preservation and accessibility Affordable housing	Rental units rehabilitated: 10 Household Housing Unit Homeowner Housing Rehabilitated: 350 Household Housing Unit
9	Housing Repair	Housing preservation and accessibility Affordable housing	Rental units rehabilitated: 40 Household Housing Unit Homeowner Housing Rehabilitated: 500 Household Housing Unit
11	Housing Assistance (TBRA and Homeownership)	Affordable housing	Direct Financial Assistance to Homebuyers: 10 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 150 Households Assisted
13	New Housing Construction	Affordable housing	Rental units constructed: 200 Household Housing Unit Homeowner Housing Added: 20 Household Housing Unit
18	Community Development Infrastructure/Facilities	Community development facilities/infrastructure	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 200000 Persons Assisted Buildings Demolished: 10 Buildings
19	Community Development Public Services	Community development public services	Public service activities other than Low/Moderate Income Housing Benefit: 15000 Persons Assisted
20	Economic Development	Economic development	Jobs created/retained: 100 Jobs Businesses assisted: 5 Businesses Assisted

Sort Order	Goal Name	Needs Addressed	Goal Outcome Indicator
21	Fair Housing	Supportive housing/fair housing special needs	Other: 100 Other
22	Training and Technical Assistance	Training technical assistance/capacity building	Businesses assisted: 200 Businesses Assisted
23	Administration	Administration	Other: 1 Other

Attachment D:



**Development
Services Agency**

Draft Program Year 2020 Ohio Consolidated Plan National Housing Trust Fund Allocation Plan

April 2020

Prepared By:
Ohio Development Services Agency
Community Services Division
Office of Community Development

Mike DeWine, Governor of Ohio
Jon Husted, Lt. Governor
Lydia L. Mihalik, Director
Ohio Development Services Agency

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Introduction

NHTF Overview

The National Housing Trust Fund (NHTF) was established by Title I of the Housing and Economic Recovery Act of 2008 (HERA), Section 1131 (Public Law 110-289) to increase and preserve rental housing as well as increase homeownership for very LMI families, including those experiencing homelessness, through formula grants to states. HERA authorized Fannie Mae and Freddie Mac (the Government Sponsored Enterprises (GSE's)) to set aside 4.2 basis points of unpaid principal purchases. Of those set asides, 65% is dedicated to the NHTF while the remaining 35% is reserved for the Capital Magnet Fund. Contributions to the NHTF were originally scheduled to begin in FY2010 but were suspended following the GSE's conservatorship. In December 2014, the GSEs were instructed to set aside NHTF funds beginning in FY2015.

HERA did not make the labor standards of Davis-Bacon applicable to the NHTF and the U.S. Department of Housing and Urban Development (HUD) did not require Davis-Bacon labor standards in the NHTF Final Rule. The Affirmatively Furthering Fair Housing requirements applicable to HUD funding recipients and all fair housing laws do apply to NHTF activities, including HUD's April 4, 2016, guidance regarding the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions.

On February 8, 2016, then Governor Kasich sent a designation letter to HUD Secretary Julian Castro identifying the Ohio Development Services Agency (Development) as Ohio's NHTF administrator and the Ohio Housing Finance Agency (OHFA) as the allocating entity. HUD interpreted this designation to name Development as the grantee and OHFA as the subgrantee. OHFA will not subgrant any NHTF funds. HUD has not yet published the program year 2020 Housing Trust Fund Allocation Notice.

The state of Ohio is required to submit an annual allocation plan for Development, as well as an annual action plan for the subgrantee OHFA. This NHTF Allocation Plan will serve as Development's NHTF Allocation Plan. The final submittal will include both Development's and OHFA's NHTF Allocation Plans. The grant agreement, which outlines the requirements of the subgrantee has been included in Attachment A.

Ohio's NHTF Planning Process

Original Allocation Plan: A NHTF Public Forum was held on February 25, 2016, to discuss implementing Ohio's expected allocation. The forum was attended by federal, state, and local agencies; advocacy organizations; and members of the development community. Following the Public Forum an open invitation encouraging interested parties to attend three Advisory Group Work Sessions was posted online. Held between March and May 2016, these sessions identified and refined the following public objectives for the NHTF: achieving lower rents in Housing Tax Credit properties, allocating dollars to support non-Housing Tax Credit multifamily developments, and preserving existing affordable housing through the leveraging of 4% Housing Tax Credits. The Advisory Group did not recommend preferences or limitations to a particular segment of extremely- or very-low income households; accordingly, Ohio does not intend to limit beneficiaries or give preferences to a particular segment of the extremely low-income population in its NHTF program.

With this information, Development submitted a draft Allocation Plan for posting to Development's website commencing the formal comment period on June 24, 2016. A public forum on the draft Allocation Plan was held on June 21, 2016, and a public hearing was held on June 26, 2016. In response to the feedback received through these public comment opportunities, a final Allocation Plan was completed, revised to incorporate HUD suggestions, and received HUD approval on December 30, 2016.

Program Year 2020 (PY20) Updates: This PY20 Allocation Plan builds upon the original allocation plan to implement best practices identified in operations of the NHTF program and to incorporate changes and revisions necessary to comply with the Interim Rule or HUD approval requirements. This PY20 Allocation

Plan will be released for public comment on March 13, 2020, and will be the subject of a Public Hearing on March 19, 2020. The final draft will be submitted to HUD once the final PY 2020 allocation is released.

Note that all NHTF activities must adhere to the requirements of 24 CFR Part 93; to any extent this Allocation Plan conflicts with that Interim Rule, the Rule shall govern. These guidelines may be subject to change pending developments in federal and state legislative requirements and/or Development policy. All awards are contingent upon the availability of funds to Development's Office of Community Development.

Questions concerning the NHTF should be directed to:

Office of Community Development
Riffe Center, 26th Floor
77 South High Street
Columbus, Ohio 43215
Phone: (614) 466-2285
lan.thomas@development.ohio.gov

Ohio Consolidated Plan Housing Goals

As a formula block grant, NHTF allocations must be made in accordance with Ohio's Consolidated Plan (ConPlan). Development, through a public input process, develops the five-year ConPlan to identify affordable housing and community development needs and implements a framework to address those needs.

As articulated in the ConPlan, the goal of the Housing Development Assistance Program (HDAP) is "to support the capacity of housing development organizations and to provide financing for eligible housing developments to expand the supply of decent, safe, affordable housing for very low-income to moderate-income persons and households in the state of Ohio." HDAP and, through it, NHTF, as part of HDAP, helps to achieve the following goals and objectives from the State of Ohio's PY Program Year 2020-2024 ConPlan:

1. **Housing Preservation and Accessibility.** To provide funding for a flexible, community-wide approach to preserving and making accessible affordable owner and rental housing for low- and moderate-income (LMI) households by bringing the housing unit up to program standards and codes, eliminating hazards and deficiencies in major systems and reducing maintenance cost.
2. **Creating New Affordable Housing Opportunities.** To provide funding for a flexible, community-wide approach to creating new affordable housing opportunities for low- and moderate-income (LMI) persons.

Also See: 24 CFR §91.100

Distribution of Funds

Distribution of Funds through OHFA Programs

As permitted by the Interim Rule, up to 10% of the \$8,755,082 PY20 allocation will be used to offset administrative costs. All programmatic funds will be distributed through OHFA's existing HDAP.

OHFA will prioritize the use of NHTF funds to expand the overall number of housing units available to the Extremely Low Income (ELI) population and to prevent supplementation of existing resources that are already creating ELI units. Subject to applicant demand and qualification, OHFA anticipates the NHTF assistance being awarded through the HDAP programs as follows:

- 60% through the Bond Gap Financing (BGF) program
- 40% through the Housing Development Gap Financing (HDGF) program

Applicants may apply for no more than \$3 million in NHTF per project. If there are insufficient qualifying applications to commit the full NHTF award through BGF or HDGF, any remaining funds will be distributed through the Housing Credit Gap Financing (HCGF) program.

HDAP funds are awarded on a competitive basis and must receive approval from the OHFA Board. Awarded funds are structured as a deferred loan with payment due on sale. The mandatory rental affordability period and the loan term are a minimum of 30 years. The interest rate is 0.00%.

Contract Execution & Draws

All NHTF recipients must execute a funding agreement, as drafted by OHFA, that meets the requirements of 24 CFR §93.404. A [Guide to Requesting HDAP Funds](#) is available to assist applicants as they work with OHFA staff during the construction phase.

Also see: 24 CFR §91.220(l)(5)(B), 24 CFR §91.320(k)(5), 24 CFR §93.200

Eligibility Requirements

Eligible Applicants

Eligible applicants include private for-profit housing developers, not-for-profit 501(c)(3) and 501(c)(4) organizations, and public housing authorities. Applicants must demonstrate sufficient experience and capacity to:

- Own, construct, rehabilitate, manage, and operate affordable multifamily rental housing;
- Undertake, comply, and manage eligible NHTF activity; and
- Manage other programs that may be used in conjunction with NHTF funds including, but not limited to, HDAP.

Additional eligibility criteria are set forth in the HDGF Guidelines and BGF Guidelines and incorporated herein. Applicants must make acceptable assurances that they will comply with the requirements of the NHTF during the entire program period.

Eligible Activities

NHTF funds may be used for the production, preservation, and rehabilitation of affordable rental housing. Eligible activities include, but may not be limited to, acquisition, new construction, reconstruction, or rehabilitation of non-luxury housing with suitable amenities. More specifically, this includes real property acquisition, site improvements, conversion, demolition, financing costs, and relocation expenses of any displaced persons. NHTF funds may only be used for public housing in limited circumstances. See 24 CFR §93.203 for further information.

Applicants for NHTF funds will be required to describe the eligible activities to be conducted with HTF funds (as provided in 24 CFR § 93.200) as well as certify that HTF-assisted housing units will comply with all HTF requirements. Applicants must meet all OHTF/HOME eligibility criteria to also be eligible for a NHTF award.

Ohio's NHTF funds are not available for operating subsidies or to refinance existing debt secured to rental housing units. Additionally, OHFA does not intend to use any NHTF funds for homebuyer activities in the 2020 funding cycle. As such, there are no applicable resale, recapture, or affordability provisions related to homebuyer activities.

Also see: 24 CFR §91.220(l)(5)(B), 24 CFR §91.220(l)(5)(E), 24 CFR §91.220(l)(5)(F), 24 CFR §91.220(l)(5)(H), 24 CFR §91.320(k)(5), 24 CFR §93.200

Rehabilitation Standards

Minimum rehabilitation standards are governed by the [Housing Rehabilitation Handbook Part II](#), as issued by Development. This guide includes standards for:

- Health and safety;
- Major systems;
- Lead-based paint;
- Accessibility;
- Disaster mitigation;
- State and local codes, ordinances, and zoning requirements; and
- Inspectable areas and observable deficiencies from HUD's Uniform Physical Condition Standards identified by HUD as applicable to NHTF-assisted housing.

In addition, all NHTF activities must meet minimum standards as set forth in the current [HDGF Guidelines](#), the [BGF Guidelines](#), the [Multifamily Underwriting Guidelines](#), the [Design & Architectural Standards](#), and all other multifamily program guides utilized by the development. The OHFA Multifamily Underwriting Guidelines outline requirements for completing a Physical Capital Needs Assessment, which OHFA requires for all projects involving rehabilitation. Specific to projects utilizing NHTF, if the remaining useful life of one or more major system is less than the affordability period, NHTF recipients will be required to establish a replacement reserve and make monthly payments to the reserve that are adequate to repair or replace the systems as needed.

NHTF-funded housing must meet the accessibility requirements in 24 CFR part 8, which implements section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. For "Covered multifamily dwellings," as defined at 24 CFR 100.201, the housing must meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601-3619). Note that NHTF funds may be used for improvements that permit use by a person with disabilities, even if they are not required by statute or regulation.

Awardees must adhere to the standards set forth in OHFA's [Uniform Relocation Documents](#) to minimize displacement of residents during rehabilitation activities.

Also see: 24 CFR §91.220(l)(5)(D), 24 CFR §93.200, 24 CFR §93.301(b)(1)

Maximum Per-Unit Development Subsidy

NHTF may not be used in connection with luxury housing. NHTF expenditures must be reasonable and based on actual costs. The maximum per-unit development subsidy shall be the same as the HOME maximum per-unit subsidy limit as determined by HUD. These limits vary by bedroom and, in some

program years, geographic location. The current HOME maximum per-unit subsidy limits are specifically incorporated herein and set forth below:

Efficiency	1br	2br	3br	4br
\$149,868	\$171,802	\$208,913	\$270,266	\$296,666

The designation of HOME maximum per-unit subsidy limits is justified, reasonable, and appropriate under the NHTF Interim Rule.

Setting the NHTF maximum per-unit subsidy limits at the existing HOME limits is allowed by HUD and cost data indicate the use of the HOME limits is appropriate as the initial baseline cap for the amount of NHTF investment that may be put into any NHTF- assisted unit. However, it is important to note that the cap is not the only mechanism OHFA will use to allocate no more NHTF funds than allowable and necessary for project quality and affordability. Each application for NHTF funding will be reviewed and analyzed in accordance with OHFA's Multifamily Underwriting Guidelines. Further, OHFA staff has extensive experience in this area, including through its allocation and administration of the HOME program. The review includes an examination of sources and uses, including any operating or project based rental assistance, and a determination that all costs are reasonable. Through its underwriting process, OHFA will ensure that the level of NHTF subsidy provided: 1) does not exceed the actual NHTF eligible development cost of the unit, 2) that the costs are reasonable and in line with similar projects across the state, 3) the developer is not receiving excessive profit, and 4) NHTF funding does not exceed the amount necessary for the project to be successful for the affordability period.

Also see: 24 CFR §93.300

Application Requirements

Application Submission and Fee

Submissions will flow through the respective HDAP program (BGF, HDGF, or HCGF). All applicants must submit a complete HDAP application and a NHTF Supplemental Application. Please see the [HDGF Guidelines and/or BGF Guidelines](#) for full application instructions.

Threshold Requirements

Applicants must submit a qualifying application and meet all requirements of the respective HDAP program to which they are applying. Refer to the HDGF Guidelines and/or BGF Guidelines for further information.

Supplemental Application

In addition, applicants must complete a NHTF Supplemental Application. The Supplemental Application will collect the below mandatory information. Failure to respond to or satisfy these threshold requirements will result in removal from NHTF consideration.

- Experience and Capacity
- Description of eligible activities to be conducted with NHTF funds
- Description of applicant's ability to undertake eligible activities in a timely manner
- Statement describing if/how NHTF units will be integrated with higher income units
- Statement describing tenant recruitment and selection process
- Certification of Compliance with all NHTF requirements

Affordability

In addition to other HDAP affordability requirements¹, NHTF-funded projects must commit to providing affordable rents to extremely low-income households through the greater of either:

- 10% of affordable units rent restricted at 30% of 30% AMI; or
- 5 units rent restricted at 30% of 30% AMI

Developments utilizing both OHTF/HOME and NHTF funding must incorporate the rent restrictions for each funding type without overlap. In no case shall rent plus utilities on any NHTF-assisted unit(s) exceed 30% of Area Median Income (AMI).

All NHTF rent restrictions must be reflected in the HDAP application. OHFA encourages applicants to offer rents below the 30% of AMI minimum requirements. If an applicant does not qualify, or is not selected for NHTF funding, OHFA will reevaluate the budget for HDAP funding through OHTF/HOME with or without the additional NHTF rent restrictions and applicants may amend the budget accordingly at the final application.

Tenant Selection

To promote inclusionary screening practices, recipients of NHTF funds must consider mitigating criteria in deciding whether to select any tenant-applicant, including but not limited to:

- Tenant-applicants lacking proof of employment and/or income at three or more times the monthly cost of rent;
- Tenant-applicants with no credit history; and
- Tenant-applicants with an eviction history.

NHTF recipients must adhere to all guidance contained in HUD's [Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions](#) including but not limited to prohibitions on exclusionary policies based on arrests without convictions and requirements to consider mitigating circumstances for conviction records.

Also see: 24 CFR §91.220(l)(5)(B), 24 CFR §91.320(k)(5)(ii), 24 CFR §93.250, 24 CFR §93.302(b)(1)(i)

Priority Funding Criteria

- a. In addition to threshold criteria, the NHTF Supplemental Application will collect the following priority funding information. Where scoring is necessary, this information will be used to prioritize applications for funding in conjunction with any other competitive criteria for the specific funding program. Geographic Diversity² (up to 10 points)
 - i. Priority given to projects located in either a Moderate, High, or Very High Opportunity Area or are of Slight, Strong, or Strongest Growth as defined by the [OHFA USR Opportunity Index](#).
- b. Project-based Rental Assistance (up to 10 points)
 - i. Priority given to projects that commit to a higher number of units in the development with one or more of the below subsidies.
 1. Section 8 or Rural Development Rent Subsidy; and/or
 2. Other local, state, or federal subsidy as determined by OHFA that limits tenant rental contribution to 30% of gross household income.

¹ All HDAP developments must commit to one of the following selections, based on the location of the proposed project: (A) HUD Participating Jurisdiction: A minimum of 40 percent of the affordable units must be affordable to households with incomes at or below 50 percent of AMI (B) Non-HUD Participating Jurisdiction: A minimum of 35 percent of the affordable units must be affordable to households with incomes at or below 50 percent of AMI.

² This geographic distribution priority is consistent with Ohio's Consolidated Plan and the certification that Ohio will affirmatively further fair housing.

- c. Duration of Affordability Period (up to 10 points)
 - i. Priority given to projects that can demonstrate positive or breakeven cash flow through year 30.
- d. Priority Housing Needs of the State (up to 10 points)
 - i. Affordable Housing Demand: Priority given to projects that are located in a census tract that has 100 or fewer available and affordable rental units per 100 very-low income (VLI) renters.
 - ii. Severe Housing Needs: Priority given to projects that are located in a county with a high percentage of severe housing problems for renters as defined in the FY20 Ohio Housing Needs Assessment.
- e. Leveraging (up to 10 points)
 - i. Priority given to projects with a budget that includes >50% financing from non-federal, non-OHFA sources³.

In the event of a tie score, the following criteria will determine funding priority:

1. Developments with other funding requiring affordability restrictions beyond 30 years
2. Developments with the most units affordable at or below 30% AMI
3. Developments that receive the most points under the Geographic Diversity category

Also see: 24 CFR §91.220(l)(5)(A), 24 CFR §91.320(k)(5)(i)

State-Limited Beneficiaries

During the initial public input process, stakeholders, including the advisory group, did not recommend preferences or limitations to a particular segment of extremely- or very-low income households; accordingly, Ohio does not intend to limit beneficiaries or give preferences to a particular segment of the extremely low income population in its NHTF program at this time.

Rental housing owners may limit tenants or give a preference in accordance with 24 CFR §93.303(d)(3) only to the extent such a preference complies with all fair housing requirements and is described in the Consolidated Plan.

Also see: 24 CFR §91.220(l)(5)(G); 24 CFR §93.303(d)(3)

Performance Goals and Benchmarks

Performance goals in PY20 are subject to HUD allocation amounts, which are not yet available. OHFA expects that in PY20, NHTF will support approximately eight new or preserved housing developments and will create approximately 100 units with rents that do not exceed 30% of 30% AMI and are therefore affordable to extremely low-income families. Recipients of NHTF funds will be responsible for compliance with applicable reporting, file and physical inspections, and record keeping requirements described in guidance published on the OHFA Compliance Division website.

Also see: 24 CFR §91.220(l)(5)(C), 24 CFR §91.320(k)(5)(iii)

³ Non-Federal funding sources include but are not limited to equity, private debt, Federal Home Loan Bank's Affordable Housing Program, foundations, in-kind donations, tax abatements, and other state and local resources.



National Housing Trust Fund Allocation Plan Program Year 2020

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1. Introduction

1.1 NHTF Overview

The National Housing Trust Fund (NHTF) was established by Title I of the Housing and Economic Recovery Act of 2008 (HERA), Section 1131 (Public Law 110-289) to increase and preserve rental housing as well as increase homeownership for very low- and extremely low-income families, including those experiencing homelessness, through formula grants to states. HERA authorized Fannie Mae and Freddie Mac (the GSEs) to set aside 4.2 basis points of unpaid principal purchases. 65 percent of those set asides are dedicated to the NHTF while the remaining 35 percent is reserved for the Capital Magnet Fund. Contributions to the NHTF were originally scheduled to begin in FY2010 but suspended following the GSE's conservatorship. In December 2014, the GSEs were instructed to set aside NHTF funds beginning in FY2015.

HERA did not make the labor standards of Davis-Bacon applicable to the NHTF and the U.S. Department of Housing and Urban Development (HUD) did not require Davis-Bacon labor standards in the NHTF Final Rule. Ohio Prevailing Wage requirements may apply.

The Affirmatively Furthering Fair Housing requirements applicable to HUD funding recipients and all fair housing laws do apply to NHTF activities, including HUD's April 4, 2016 guidance regarding the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions.

On February 8, 2016, Governor Kasich sent a designation letter to HUD Secretary Julian Castro identifying the Ohio Development Services Agency (ODSA) as Ohio's NHTF administrator and the Ohio Housing Finance Agency (OHFA) as the allocating entity. HUD interpreted this designation to name ODSA as the Grantee and OHFA as the Subgrantee. OHFA will not subgrant any NHTF funds.

The State is required to submit an annual National Housing Trust Fund Allocation Plan; this document serves that purpose. HUD has not yet published the program year 2020 Housing Trust Fund Allocation Notice.

Also see: §93.303(d)

1.2 Ohio's NHTF Planning Process

Original Allocation Plan: OHFA hosted multiple public forums, advisory group work sessions, and received stakeholder feedback in 2016 to discuss implementing Ohio's expected allocation of NHTF. As a result of the feedback, OHFA identified the following public objectives for the NHTF: achieving lower rents in Housing Tax Credit properties, allocating dollars to support non-Housing Tax Credit multifamily developments, and preserving existing affordable housing through the leveraging of 4 percent Housing Tax Credits. OHFA received HUD approval of the first NHTF Allocation Plan on December 30, 2016.

Program Year 2020 (PY20) Updates: This PY20 Allocation Plan builds upon the previous allocation plans to implement best practices identified in operations of the NHTF program and to incorporate changes and revisions necessary to comply with the Interim Rule or HUD approval requirements. This PY20 Allocation Plan will be released for public comment on March 1, 2020, and will be the

subject of a Public Hearing as part of the Ohio Consolidated Plan Public Hearing on April 16, 2020.

Note that all NHTF activities must adhere to the requirements of 24 CFR Part 93; to any extent this Allocation Plan conflicts with that Interim Rule, the Rule shall govern. These guidelines may be subject to change pending developments in federal and state legislative requirements and/or OHFA policy. All awards are contingent upon the availability of funds to OHFA.

Questions concerning the NHTF should be directed to:

Ohio Housing Finance Agency
Office of Multifamily Housing, Development Division
57 East Main Street
Columbus, Ohio 43215

NHTFAllocation@ohiohome.org

1.3 Ohio Consolidated Plan Housing Goals

As a formula block grant, NHTF allocations must be made in accordance with Ohio's Consolidated Plan. ODSA, through a public input process, develops the five-year Consolidated Plan to identify affordable housing and community development needs and implements a framework to address those needs.

As articulated in the Consolidated Plan, the goal of OHFA's Housing Development Assistance Program (HDAP) is "to support the capacity of housing development organizations and to provide financing for eligible housing developments to expand the supply of decent, safe, affordable housing for very low-income to moderate-income persons and households in the state of Ohio." NHTF, as part of HDAP, helps to achieve the following goals and objectives from the State of Ohio's PY 2020-2024 Consolidated Plan:

1. **Housing Preservation and Accessibility.** To provide funding for a flexible, community-wide approach to preserving and making accessible affordable owner and rental housing for low- and moderate-income (LMI) households by bringing the housing unit up to program standards and codes, eliminating hazards and deficiencies in major systems and reducing maintenance cost.
2. **Create New Affordable Housing.** To provide funding for a flexible, community-wide approach to creating new affordable housing opportunities for low- and moderate-income (LMI) persons.

Also see: 24 CFR §91.100

2. Distribution of Funds

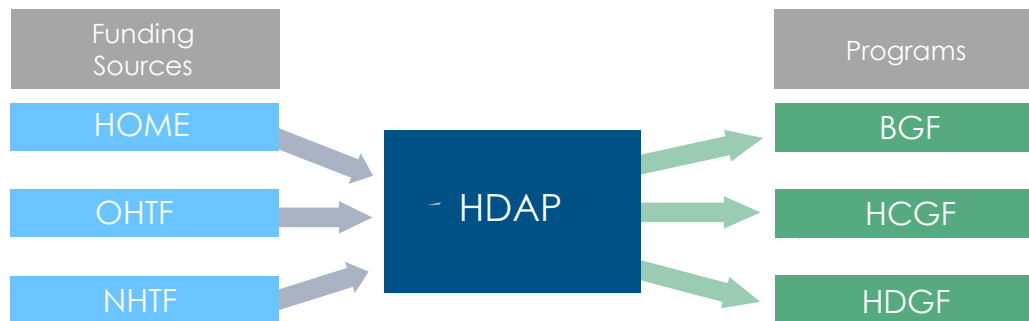
2.1 Distribution of Funds through OHFA Programs

As permitted by the Interim Rule, up to 10 percent of the \$8,755,082 PY20 allocation will be used to offset administrative costs. All programmatic funds will be distributed through OHFA's existing HDAP.

OHFA will prioritize the use of NHTF funds to expand the overall number of housing units available to the Extremely Low Income (ELI) population and to prevent supplantation of existing resources that are already creating ELI units. Subject to applicant demand and qualification, OHFA anticipates the NHTF assistance being awarded through the HDAP programs as follows:

- 60 percent through the Bond Gap Financing (BGF) program
- 40 percent through the Housing Development Gap Financing (HDGF) program

Applicants may apply for no more than \$3 million in NHTF per project. If there are insufficient qualifying applications to commit the full NHTF award through BGF or HDGF, any remaining funds will be distributed through the Housing Credit Gap Financing (HCGF) program.



HDAP funds are awarded on a competitive basis and must receive approval from the OHFA Board. Awarded funds are structured as a deferred loan with payment due on sale. The mandatory rental affordability period and the loan term are a minimum of 30 years. The interest rate is 0.00%.

2.2 Contract Execution & Draws

All recipients of NHTF must execute a funding agreement, as drafted by OHFA, that meets the requirements of 24 CFR §93.404. A [Guide to Requesting HDAP Funds](#) is available to assist applicants as they work with OHFA staff during the construction phase.

Also see: §91.220(l)(5)(B), §91.320(k)(5), §93.200

3. Eligibility Requirements

3.1 Eligible Applicants

Eligible applicants include private for-profit housing developers, not-for-profit 501(c)(3) and 501(c)(4) organizations, and public housing authorities. Applicants must demonstrate sufficient experience and capacity to:

- Own, construct, rehabilitate, manage, and operate affordable multifamily rental housing;
- Undertake, comply, and manage eligible NHTF activity; and
- Manage other programs that may be used in conjunction with NHTF funds including, but not limited to, HDAP.

Additional eligibility criteria are set forth in the HDGF Guidelines and BGF Guidelines and incorporated herein. Applicants must make acceptable assurances that they will comply with the requirements of the NHTF during the entire program period.

3.2 Eligible Activities

NHTF funds may be used for the production, preservation, and rehabilitation of affordable rental housing. Eligible activities include, but may not be limited to, acquisition, new construction, reconstruction, or rehabilitation of non-luxury housing with suitable amenities. More specifically, this includes real property acquisition, site improvements, conversion, demolition, financing costs, and relocation expenses of any displaced persons. NHTF funds may only be used for public housing in limited circumstances. See 24 CFR §93.203 for further information.

Applicants for NHTF funds will be required to describe the eligible activities to be conducted with HTF funds (as provided in § 93.200) as well as certify that HTF-assisted housing units will comply with all HTF requirements. Applicants must meet all OHTF/HOME eligibility criteria to also be eligible for a NHTF award.

Due to the limited amount of funding available in the 2020 funding cycle, Ohio's NHTF funds are not available for operating subsidies or to refinance existing debt secured to rental housing units. Additionally, OHFA does not intend to use any NHTF funds for homebuyer activities in the 2020 funding cycle. As such, there are no applicable resale, recapture, or affordability provisions related to homebuyer activities.

Also see: §91.220(l)(5)(B), §91.220(l)(5)(E), §91.220(l)(5)(F), §91.220(l)(5)(H), §91.320(k)(5), §93.200

4. Rehabilitation Standards

Minimum rehabilitation standards are governed by the [Housing Rehabilitation Handbook Part II](#) as issued by ODSA. This guide includes standards for:

- Health and safety;
- Major systems;
- Lead-based paint;
- Accessibility;
- Disaster mitigation;
- State and local codes, ordinances, and zoning requirements; and
- Inspectable areas and observable deficiencies from HUD's Uniform Physical Condition Standards identified by HUD as applicable to NHTF-assisted housing.

In addition, all NHTF activities must meet minimum standards as set forth in the current [HDGF Guidelines](#), [BGF Guidelines](#), the [Multifamily Underwriting Guidelines](#), the [Design & Architectural Standards](#), and all other multifamily program guides utilized by the development. The OHFA Multifamily Underwriting Guidelines outline requirements for completing a Physical Capital Needs Assessment, which OHFA requires for all projects involving rehabilitation. Specific to projects utilizing NHTF, if the remaining useful life of one or more major system is less than the affordability period, NHTF recipients will be required to establish a replacement reserve and make monthly payments to the reserve that are adequate to repair or replace the systems as needed.

NHTF-funded housing must meet the accessibility requirements in 24 CFR part 8, which implements section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and Titles II and III of the Americans with Disabilities Act (42 U.S.C. 12131-12189) implemented at 28 CFR parts 35 and 36, as applicable. For "Covered multifamily dwellings," as defined at 24 CFR 100.201, the housing must meet the design and construction requirements at 24 CFR 100.205, which implements the Fair Housing Act (42 U.S.C. 3601-3619). Note that NHTF funds may be used for improvements that permit use by a person with disabilities, even if they are not required by statute or regulation.

Awardees must adhere to the standards set forth in OHFA's [Uniform Relocation Documents](#) to minimize displacement of residents during rehabilitation activities.

Also see: §91.220(l)(5)(D), §93.200, §93.301(b)(1)

5. Maximum Per-Unit Development Subsidy

NHTF may not be used in connection with luxury housing. NHTF expenditures must be reasonable and based on actual costs. The maximum per-unit development subsidy shall be the same as the HOME maximum per-unit subsidy limit as determined by HUD. These limits vary by bedroom and, in some program years, geographic location. The current HOME maximum per-unit subsidy limits are specifically incorporated herein and set forth below:

Efficiency	1br	2br	3br	4br
\$149,868	\$171,802	\$208,913	\$270,266	\$296,666

The designation of HOME maximum per-unit subsidy limits is justified, reasonable, and appropriate under the NHTF Interim Rule.

Setting the NHTF maximum per-unit subsidy limits at the existing HOME limits is allowed by HUD and cost data indicate the use of the HOME limits is appropriate as the initial baseline cap for the amount of NHTF investment that may be put into any NHTF-assisted unit. However, it is important to note that the cap is not the only mechanism OHFA will use to allocate no more NHTF funds than allowable and necessary for project quality and affordability. Each application for NHTF funding will be reviewed and analyzed in accordance with OHFA's Multifamily Underwriting Guidelines. Further, OHFA staff has extensive experience in this area, including through its allocation and administration of the HOME program. The review includes an examination of sources and uses, including any operating or project based rental assistance, and a determination that all costs are reasonable. Through its underwriting process, OHFA will ensure that the level of NHTF subsidy provided: 1) does not exceed the actual NHTF eligible development cost of the unit, 2) that the costs are reasonable and in line with similar projects across the state, 3) the developer is not receiving excessive profit, and 4) NHTF funding does not exceed the amount necessary for the project to be successful for the affordability period.

Also see: §93.300

6. Application Requirements

6.1 Application Submission and Fee

Submissions will flow through the respective HDAP program (BGF, HDGF, or HCGF). All applicants must submit a complete HDAP application and a NHTF Supplemental Application. Please see the [HDGF Guidelines and/or BGF Guidelines](#) for full application instructions.

6.2 Threshold Requirements

Applicants must submit a qualifying application and meet all requirements of the respective HDAP program to which they are applying. Refer to the HDGF Guidelines and/or BGF Guidelines for further information.

Supplemental Application

In addition, applicants must complete a NHTF Supplemental Application. The Supplemental Application will collect the below mandatory information. Failure to respond to or satisfy these threshold requirements will result in removal from NHTF consideration.

- Experience and Capacity
- Description of eligible activities to be conducted with NHTF funds
- Description of applicant's ability to undertake eligible activities in a timely manner
- Statement describing if/how NHTF units will be integrated with higher income units
- Statement describing tenant recruitment and selection process
- Certification of Compliance with all NHTF requirements

Affordability

In addition to other HDAP affordability requirements¹, NHTF-funded projects must commit to providing affordable rents to extremely low income households through the greater of either:

- 10 percent of affordable units rent restricted at 30 percent of 30 percent AMI; or
- 5 units rent restricted at 30 percent of 30 percent AMI

Developments utilizing both OHTF/HOME and NHTF funding must incorporate the rent restrictions for each funding type without overlap. In no case shall rent plus utilities on any NHTF-assisted unit(s) exceed 30 percent of Area Median Income (AMI).

All NHTF rent restrictions must be reflected in the HDAP application. OHFA encourages applicants to offer rents below the 30 percent of AMI minimum requirements. If an applicant does not qualify, or is not selected for NHTF funding, OHFA will reevaluate the budget for HDAP funding through OHTF/HOME with or without the additional NHTF rent restrictions and applicants may amend the budget accordingly at the final application.

¹ All HDAP developments must commit to one of the following selections, based on the location of the proposed project: (A) HUD Participating Jurisdiction: A minimum of 40 percent of the affordable units must be affordable to households with incomes at or below 50 percent of AMI (B) Non-HUD Participating Jurisdiction: A minimum of 35 percent of the affordable units must be affordable to households with incomes at or below 50 percent of AMI.

Tenant Selection

To promote inclusionary screening practices, recipients of NHTF funds must consider mitigating criteria in deciding whether to select any tenant-applicant, including but not limited to:

- Tenant-applicants lacking proof of employment and/or income at three or more times the monthly cost of rent;
- Tenant-applicants with no credit history; and
- Tenant-applicants with an eviction history.

NHTF Recipients must adhere to all guidance contained in HUD's [Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions](#) including but not limited to prohibitions on exclusionary policies based on arrests without convictions and requirements to consider mitigating circumstances for conviction records.

Also see: §91.220(l)(5)(B), §91.320(k)(5)(ii), §93.250, §93.302(b)(1)(i)

7. Priority Funding Criteria

In addition to threshold criteria, the NHTF Supplemental Application will collect the following priority funding information. Where scoring is necessary, this information will be used to prioritize applications for funding in conjunction with any other competitive criteria for the specific funding program.

- a. Geographic Diversity² (up to 10 points)
 - i. Priority given to projects located in either a Moderate, High, or Very High Opportunity Area or are of Slight, Strong, or Strongest Growth as defined by the [OHFA USR Opportunity Index](#).
- b. Project-based Rental Assistance (up to 10 points)
 - i. Priority given to projects that commit to a higher number of units in the development with one or more of the below subsidies.
 1. Section 8 or Rural Development Rent Subsidy; and/or
 2. Other local, state, or federal subsidy as determined by OHFA that limits tenant rental contribution to 30% of gross household income.
- c. Duration of Affordability Period (up to 10 points)
 - i. Priority given to projects with affordability periods longer than 30 years as required by other state or federal funding sources.
 - ii. Priority given to projects that can demonstrate positive or breakeven cash flow through year 30.
- d. Priority Housing Needs of the State (up to 10 points)
 - i. Affordable Housing Demand: Priority given to projects that are located in a census tract that has 100 or fewer available and affordable rental units per 100 very-low income (VLI) renters.
 - ii. Severe Housing Needs: Priority given to projects that are located in a county with a high percentage of severe housing problems for renters as defined in the FY20 Ohio Housing Needs Assessment.
- e. Leveraging (up to 10 points)
 - i. Priority given to projects with a budget that includes >50% financing from non-federal, non-OHFA sources³.

In the event of a tie score, the following criteria will determine funding priority:

1. Developments with other funding requiring affordability restrictions beyond 30 years
2. Developments with the most units affordable at or below 30 percent AMI
3. Developments that receive the most points under the Geographic Diversity category

Also see: §91.220(l)(5)(A), §91.320(k)(5)(i)

² This geographic distribution priority is consistent with Ohio's Consolidated Plan and the certification that Ohio will affirmatively further fair housing.

³ Non-Federal funding sources include but are not limited to equity, private debt, Federal Home Loan Bank's Affordable Housing Program, foundations, in-kind donations, tax abatements, and other state and local resources.

8. State-Limited Beneficiaries or Preferences

During the initial public input process, stakeholders, including the advisory group, did not recommend preferences or limitations to a particular segment of extremely- or very-low income households; accordingly, Ohio does not intend to limit beneficiaries or give preferences to a particular segment of the extremely low income population in its NHTF program at this time.

Rental housing owners may limit tenants or give a preference in accordance with 24 CFR §93.303(d)(3) only to the extent such a preference complies with all fair housing requirements and is described in the Consolidated Plan.

Also see: §91.220(l)(5)(G); §93.303(d)(3)

9. Performance Goals and Benchmarks

Performance goals in PY20 are subject to HUD allocation amounts, which are not yet available. OHFA expects that in PY20, NHTF will support approximately eight new or preserved housing developments and will create approximately 100 units with rents that do not exceed 30 percent of 30 percent AMI and are therefore affordable to extremely low income families. Recipients of NHTF funds will be responsible for compliance with applicable reporting, file and physical inspections, and record keeping requirements described in guidance published on the OHFA Compliance Division website.

Also see: §91.220(l)(5)(C), §91.320(k)(5)(iii)



Development
Services Agency

Amended Program Year 2020 - 2024 Ohio Consolidated Plan Public Comments Received

July 2020

Prepared By:
Ohio Development Services Agency
Community Services Division
Office of Community Development

Mike DeWine, Governor of Ohio
Jon Husted, Lt. Governor
Lydia L. Mihalik, Director
Ohio Development Services Agency

Comments from the PY 2020 – 2024 Needs Hearing

The Office of Community Development held the **Public Hearing on Needs Issues** to receive comments regarding the OCD-administered programs. Verbal and written comments were permitted during the hearing. The deadline for written comments was September 16, 2019. All information that was made available for public viewing and comment along with the memos announcing these opportunities was posted on the Development website at https://development.ohio.gov/cs/cs_ocp.htm.

Comment:

Heritage Ohio believes that investing in Ohio's downtowns is the most productive use of CDBG funds available to the State of Ohio, while meeting the national objectives of reducing slum and blight and benefiting low and moderate-income people by building new economic opportunities. Every state is concerned with attracting a younger entrepreneurial advantage, and we know people now choose where they live first then create or find a job second. If we expect our smaller cities to thrive, yet alone survive, we must provide leverage for private investment in their future. Creating cities, towns and villages where someone would want to live, yet alone invest, goes beyond slick sales brochures and slogans. The infrastructure and visible building stock needs to represent we are planning on a future. Ohio ranks third in the country with national historic register listings of over 4000 single and district listings. This does not give us a precise inventory but is a good indicator that there are a lot of old buildings in Ohio, and we know from experience, the sad condition of many of these buildings. Heritage Ohio stands behind the concept of fixing our downtowns as critical for our future economic success: the solutions need to come from multiple policy fronts, which we support: historic tax credits, Downtown Redevelopment Districts, local vacant property registries etc. As I travel the state, those buildings, which have been rehabilitated, do have tenants, successful business are anxious to locate in the center of town, but in good space. The upper floor units are filled; people want to live in the great spaces downtowns offer. Heritage Ohio wants to see downtown buildings rehabilitated, we want the policies and funding opportunities across the state to be in line with a strategy, which will not just patch problems but also build a future for Ohio. We think fulfilling the needs in Ohio downtowns should be a priority use of Ohio's CDBG allocation.

Response:

Responses to these comments were made at the Program Advisory Committee meetings. The meeting minutes can be found at https://development.ohio.gov/cs/cs_ocp.htm.

Comments from the Public Hearing on the Draft PY 2020 – 2024 Ohio Consolidated Plan

The Office of Community Development held the 30-day public comment period beginning on March 13, 2020, along with a Public Hearing that took place from April 13, 2020, to April 24, 2020, to allow for the public to provide comments during the COVID-19 state of emergency. There were no comments received during the public comment period or the public hearing. The National Housing Trust Fund Allocation Plan public comment period will begin May 25 with the Public Hearing taking place May 26th.

Comments from the Public Hearing on the Draft PY 2020 – 2024 Ohio Consolidated Plan

Draft Program Year (PY) 2020 Ohio National Housing Trust Fund (NHTF) Allocation Plan

Due to the fact that the NHTF allocation was released following the PY 2020-2024 Ohio Consolidated Plan public hearing and comment period, the NHTF Allocation Plan was required to be posted with the final allocation awarded to the state of Ohio included and submitted as a substantial amendment to the state of Ohio's PY2020-2024 Consolidated Plan.

The PY 2020 NHTF Allocation Plan was released for public comment on May 25, 2020, and was subject to a Public Hearing that took place on May 26, 2020 at 10:30 a.m. The final plans have been submitted to HUD following the public comment period. There were no comments received during the public comment period or at the public hearing.

Comments from the PY 2020 - 2024 Ohio Consolidated Plan Program Advisory Committee Meetings



**PY 2020 Ohio Consolidated Plan
Supportive Housing/Homelessness Crisis Response Program
Advisory Committee Meeting**

**State Library of Ohio
274 E. 1st Ave.
Columbus, OH 43201
November 6, 2019
9:30 a.m. to 3:30 p.m.**

Welcome – Scott Gary

- 2020 program year -no significant changes planned
- Solicited ideas for improvement or avenues that may lead to more uniformity
- Introductions - 25 attending, please see attachment
- Controlling Board gave approval for 2019 SHP and HRCR recommendations making awards official. Grant agreements will be sent out early December (hopefully, pending readiness of templates/new process... including all being don electronically.
- Reviewed the agenda
- State Priorities
 - Community
 - Infrastructure
 - Innovation
 - Job creation
 - Tech credit – work with employees increasing skills
 - One-year period
 - Children and families
 - Lead-based paint
 - Recovery Housing
 - Mental health and addiction
 - Federal \$25 million pilot in first round funding
- Census is being conducted in 202, headed up by ODSA
 - Census results are important as they effect levels of federal funding

Program Updates

- 2019 HCRP Recap – Pat Hart
 - Successful, most funded at their requested amounts
 - Award notices issued
 - Grants are being processed
 - \$14.9 million in Ohio Housing Trust Fund dollars and \$5 .8 Emergency Solution Grant funds
 - Emergency shelter
 - Demonstration program
 - Five agencies operating seven shelters combined through Community Shelter Board, a Unified Funding Agency (UFA)

- 2019 SHP Recap – Amy
 - *8.2 million Ohio Housing Trust Fund dollars to 34 agencies operation 38 projects that will serve over 6,000 persons
 - 15 projects are transitional housing; 23 are permanent supportive housing

Policy Issues

- New scattered-site PSH projects: use of funds for housing focused case management – Scott Gary
 - Current restriction: NEW projects not currently funded through the SHP can only apply for operating funds
 - Rural area – BoS new scattered site PSH projects would need housing focused case management, but funding for new projects limited to operating costs.
 - Discussion on eligibility going forward
 - - Denise Stryker, Clinton County Homeless Shelter has considered a new scattered-site PSH project site for a while. There is great need and removing this restriction from current SHP funding would make scattered sites much more feasible.
 - Linda Kramer - every program is different, the more flexible the funding the better. That the target should be funding outcomes not “widgets”. Inquired about a discussion with OMHAS to match funds for supportive services for PSH for mental health or addiction case management. Linda feels that when helping people, all case management, is the same and it is difficult to separate housing from other case management. She and another group had a meeting with Governor DeWine and flexible spending dollars was one of the items discussed; therefore, she suggested the possibility of change may start with legislation.
 - Scott Gary – Because the need is so great, parameters around funding must be set as the amount of funds allocated, is not growing with the need. Under current procedures, if PSH funds could be used for case management we would be overloaded and would not have sufficient funding to fund all our current grantees as well as increased requests for a new activity. Also suggested having a meeting with OMHAS for flexible funds spending.
 - Lianna Barbu – Agreed with Linda. Added that Medicaid makes changes, that is taking monies from one pot to fund another.
 - Ruth Gillett – Agrees with flexible funding, her clients are coming with barriers, need additional support; most kids already have a disabling condition that cause additional need for long term outcomes.
 - Fred Barry – Agrees with flexible spending, adding case management is a form of housing stability.
 - Denise Fox – Agrees with special funding as long-term housing, most often needs additional visits to remain stable; therefore, case management is important and should be dependent on their need. Also added, there is a high turnover rate among case management staff due to low wage and burn out.
 - Kevin James- Not sure about the OMHAS match restrictions pertaining to use for only operations.
 - Christina Blair –Mentioned that positive outcomes results when case managers work with landlords so in support of flexible funds. Tries to hire own counselors for mental health to lessen the wait time.
 - Beth Fetzer-Rice – The case load has changed. The most vulnerable cases, such as those with addiction and mental illness, are getting turned down and those are the very situations these programs were created for. Also stated need better pay for staff retention.
 - Difference between Medicaid funded and non-Medicaid funded agencies and PSH.
 - Include additional cost in administration
 - Erica Mulryan – stated that some of the projects funded by OSDA are not the best

projects from a CoC perspective which presents several issues, with the BosCoC having no input. Would like to have some input into the new and continued funding. OCD suggested an offline meeting to discuss how the BoSCoC might be able to better show support for new SHP projects.

- Entitlement area reps discussed the Exhibit in the OCD application that requires the CoC to describe its selection process and to include documentation of the latest round of funding results (priority order and award amount). Scott discussed possible consideration for similar request from the BoSCoc for future, new PSH requests.
- Scott Gary concluded this discussion with the following comments.
 - Aside from limited Target of Opportunity Program funds, capital funds are not available for large shelter repairs or maintenance in spite of significant need.
 - Guaranteed funds for shelters in good standing provided sufficient funds are available.
 - Wants to work offline with Erica about collaborating on new projects to discuss types of information (beneficial to OCD's review process) the BoSCoC can provide.
- RRH projects-provision of funds directly to clients
 - Does not apply to HCRP funded rapid re-housing projects
 - Does apply to CoC funded rapid re-housing projects
 - Lianna Barbu states public housing authority is paying utility payments directly to the tenants, as they are required to do so.
 - Heather Hall - Harder to manage when the check is paid directly to utilities when more than one utility provider paid. If client is diligent can pay bills and have extra to buy other items the household needs. Working with clients to pay their own bills is a step toward self-sufficiency.

Performance of Projects

- Performance Standards Chart – Amy Bullard distributed chart with information as of spring 2019
 - Most important criteria to be measured and provided in status reports
 - Consistency of performance criteria throughout the state
 - Systemwide Data Analysis – Scott/Genelle/ERICAOCD hopes to look at more analysis of the data collected in HMIS by each of Ohio nine Continua of Care. Information will be provided to each HMIS lead at least six months prior to data being requested
- Amy Bullard introduced discussion about the merits of creating a statewide standard.
 - Linda Kramer, Denise Fox, and Lianna Barbu spoke up and collectively gave reasons to continue using regional performance standards
 - Different areas have differing issues
 - Different populations
 - Different needs and standards
 - Lianna Barbu – Do not add more standards, currently all are different
 - Heather Hall - Another measure – quantitative, qualitative. In a county, what are the scores of people that are homeless vs the scores of people getting help. Negative scores for youth going from Transitional Housing to Transitional Housing; had to realign the program so that it is not captured as a negative.
 - Erica Mulryan - mentioned BoS being able to provide additional contextual information.
- Scott Gary suggested that one person from each region and entitlement volunteer to participate in a discussion about data available and future reporting requirements. Those interested were to contact Amy Bullard. OCD will reach out to all regions and entitlements to invite participation.
- R Minor
 - Genelle Denzin from the HMIS team at COHHIO presented information about the new HMIS reporting tool named R minor
 - Provider level performance data is available for last 6 months and can be seen by anyone. Can

be accessed through the COHHIO website, BoSCoC page, HMIS tab

- R Minor Elevated
 - Password protected so that only HMIS users can see more detailed data and reports
- Standards for Regions and Entitlement CoCs - Amy
 - OCD is developing written standards for:
 - Governance Expectations, Housing Stability priority and use of Targeted Rapid Re-Housing funding
 - Colleen Bain- has experienced vast difference in various regions, some better than others.
 - Beth Fetzer-Rice commented that there can be issues when some agencies in a region do not feel they have a voice or fair treatment.
 - Possible follow-up to discuss the similarities and differences. Best practices vs. what could be done better
 - Coordinated Entry wait times
 - Wait times from call to be assessed
 - Lianna Barbu– 3 mins and 42 sec on phone, however, may be longer at peak times, up to 5 days for a bed for a homeless male; however, for 6 months of the year can house almost everyone
 - Different counties have different wait time and procedures
 - Peg Dierkers stated that Hamilton County may be an area with long wait times.
 - Tracy Long commented that the phone assessment form takes long time to complete in some areas.
- Client File Contents – Pat and Vernon
 - Written Documentation of Homelessness
 - Diversion verification
 - Case Plan/Goals
 - Components of housing-related case management notes
 - Vernon McNeil – discussed handling case notes if there is not a case manager?
*various participants offered to share formats used by their agencies.

Application Changes - Pat

- 2019 Budget form and Instructions to be improved for greater clarity, will remain different from the 2018 application
 - The shelter narrative attachment – will be very similar to 2019 version
 - Budget form (spreadsheet) will be slightly different, clearer
- Training offered in spring
- Application due dates yet to be set, separate dates for HCRP and SHP applications again
 - Community Shelter Board UFA demonstration project is for two years and will be evaluated at the end of that period

Youth Homeless Demonstration Projects Update

- Lianna Barbu, Community Shelter Board – recipient of Round 2 award
 - Provided a handout to participants
 - \$6 million award for two years
 - Collaborate with YMCA for rapid re-housing for youth
 - Permanent supportive housing
 - Youth uses the same coordinated entry process as others seeking assistance
 - Huckleberry house has a small side-door entry opportunity
 - Scattered-site until “units” are available
 - Hiring for the program
 - 13 units for single

- 6 units for families
- Erica Mulryan, Ohio Balance of State – recipient of Round 1 and Round 3 awards
 - Round 1 – Region 17 (5 of 7 counties)
 - \$ 2.2 million, 2-year grant
 - 3 new crisis transitional shelter projects are operational , filling the shelter gap
 - Street outreach
 - Youth rapid re-housing program - currently serving 17 TAY in scattered sites
 - Mediation back to family is always an option
 - Round 3 – Region 6
 - \$ 1.5 million
 - Currently in the planning process
 - Can access planning dollars
 - Grant executed this month
 - Hiring a consultant to assist with writing the coordinated community plan

Training Needs/Recommendations – Shannon Prince

- Shelter focused case management

Other Issues/Public Comments – Scott Gary

- Inquiry as to whether Governor plans to reconvene the housing and homeless collaborative. Folks will be updated if information becomes available.
- Interest in developing a progress report from the governor's office on homelessness and/or his plans going forth.
- Shared information on the governor's initiatives on housing, recovery housing and lead-based paint concerns.

Closing remarks – Scott Gary

**HDAP Advisory Committee Meeting Notes
November 7, 2019**

In attendance: Karen Banyai, Kat Berry, Kelan Craig, Virgie Vaido, Joe McCabe, Emily Siebel, Jeff Mohrman, Leah Evans, Nicole Boyer, Barbara Richards, Shana Garrett, Teressa Hicks, and Laurie Sutherland

Meeting participants made the following suggestions:

Support or incentivize New Construction projects.

- Scope of work on a rehab project may not be deep enough to adequately address the needs of the projects.

Prioritize larger rehab projects in PJ areas

New Construction unit count tiers for HDAP awards could be lower than those for rehab projects.

Incentivize naturally occurring affordable housing (NOAH) for rehab, particularly those with high vacancies to avoid displacement.

- May be challenges in qualifying residents under the LIHTC rules.

Provide consideration for current owners who don't sell off their portfolio.

Allow the amount of HDGF awards to exceed 50% of TDC since projects are already limited in scope and lack access to additional resources.

Add an extra month to the program calendar.

In the Development Characteristics category of the BGF Guidelines, consider incentivizing community partnerships and proximity to amenities. Consider adding a category that would enable areas of revitalization with slow, stable growth is occurring to compete.

Perhaps incentivize projects to enter into "good neighbor agreements" with neighborhood associations/civic groups who may be concerned about the potential project.

Consider stricter criteria for partnering on BGF projects so that only experienced owner/developers are eligible for this scarce resource. For 4% only projects, less experience is fine.

Increase resources in non PJ areas to serve family populations.

Prioritize projects in areas where additional local resources are allocated, i.e., projects that are leveraging effectively.

Coordinate efforts/calendar with the Franklin County 4%/bond initiative.

Prioritize "real" partnership with local groups/nonprofits/service providers.

- Demonstrate the partner brings real value to the residents.

- If the nonprofit applicant is the local organization, they should be able to demonstrate a history of working in the neighborhood or provide evidence of meeting neighborhood goals.

Modify the program calendar to be consistent with the release of the AHP results.

Reconsider offering homeownership options, particularly in communities with land trusts that retain ownership of the land under the improvements.

Representatives from ODSA pointed out that the State of Ohio's role with this program is to serve as the PJ for the State's Non-PJ areas and we need to keep that in mind when allocating resources, i.e., ensure adequate geographic distribution.



**PY 2020 Ohio Consolidated Plan
Community and Economic Development Programs
Advisory Committee Meeting**

**State Library of Ohio, Columbus, Ohio
November 5, 2019
9:00 a.m. - 3:30 p.m.**

Advisory Committee Members in Attendance:

Bill Arnett, City of Zanesville
Ryan Baker, City of Xenia
Joyce Barrett, Heritage Ohio
Mary Church, City of Ashtabula
John Cleek/Hannah Diewald, CDC of Ohio
Kelly Cole, Brown County
Terri Fetherolf, Vinton County
Ethan Harris, Clark County
Michelle Hister, Poggemeyer Design Group
Michelle Hyer, Buckeye Hills
Ralph Kline, Ironton-Lawrence County CAO
Craig Knapke, Access Engineering
Sherry Loos, Ohio RCAP
Angie McConnell, GLCAP
Dennis Miller, Maumee Valley Planning Organization
Susan Moore, ORDC
Katie Saba, W.E. Quicksall & Associates
Nathan Simons, HAPCAP
Krista Somerton, Van Wert County ED
Karen Sprague, Gallia County
Evelyn Warr-Cummings, Marion County RPC
Jeannette Wierzbicki, OMEGA

Ohio Development Services Agency (ODSA) Employees:

Haley Callahan
Karli Gibson
Jared Jodrey
Ben Kepple
Tiffany Laffitte
Mary Oakley
Wesley Watkins

Agency Updates: Ohio Development Services Agency

Mary Oakley announced leadership changes at Development and introduced staff from the Office of Community Development's (OCD) Community Investments section. Ms. Oakley also shared information about Development's role in Census 2020 and encouraged participants to educate residents in their communities about the importance being counted.

Community Development Programs

Haley Callahan reviewed changes to the Community Development Programs for PY 2019. Downtown Revitalization is no longer under the Community Development umbrella. Funds are now accessed through the Target of Opportunity Program. The program is now open cycle and focuses on building rehabilitation. The grant ceiling is \$250,000 grant ceiling and a maximum of three buildings can be included. Neighborhood Revitalization now has a \$750,000 maximum award; increased from \$500,000. Critical Infrastructure remained open cycle with a grant ceiling of \$500,000.

Ms. Callahan also summarized PY 2019 funding. Approximately \$11.2 million in Allocation grants were awarded to the 51 eligible odd-year communities. Neighborhood Revitalization grants were awarded to eight communities to complete projects in ten target areas. Critical Infrastructure grants were awarded to twelve communities to complete 13 high priority public facilities projects. Two additional communities were permitted to use Community Development Block Grant (CDBG) Economic Development (ED) Revolving Loan Funds (RLF) to alleviate critical conditions.

Grant agreements have been e-mailed. Grantees may now print, sign, and return the contracts via e-mail.

Critical Infrastructure second round applications are due December 13, 2019. Pre-applications must be submitted by November 22, 2019. Pre-applications are not required for round one resubmissions. Ms. Callahan encouraged applicants to discuss projects with their OCD representative prior to submission. OCD plans to approve all high-ranking applications but grant agreements will not be issued until funds are available.

Ms. Callahan reviewed project averages for the Allocation, Neighborhood Revitalization, and Critical Infrastructure project averages. The average Allocation grant is \$220,000 or approximately \$44,000 per project. The averages for Neighborhood Revitalization and Critical Infrastructure are \$750,000 and \$372,000, respectively.

Ms. Callahan initiated a discussion about the pros and cons of the Allocation program vs. competitive grants. Participants stated Allocation is a source of match for competitive programs when local government funds aren't available, the funds build administrative capacity in working with new staff, and funds can be used for smaller projects that don't fit the competitive model. Funds also provide opportunities for partnering with other local agencies, don't require a match, and allow planning for phased projects. There are often more requests than funds available.

Participants also stated \$750,000 was an appropriate level of funding for the Neighborhood Revitalization Program or that the grant ceiling should be increased to \$1 million. It was also stated that there should be increased coordination with housing projects for a comprehensive program.

Participants also discussed the \$500,000 Critical Infrastructure grant ceiling. Most wanted to keep the \$500,000 maximum and agreed \$300,000 was too low.

Citizen Participation

Karli Gibson informed participants that OCD is creating a new Citizen Participation Policy. The policy will include public notice and hearing requirements, recommendations, and best practices. Participants agreed this will be helpful and acknowledged confusion about how to handle jurisdictions within their counties that may be eligible for funding as direct grantees, how to address application to community development and housing programs, and partnerships.

Target of Opportunity

Tiffany Laffitte summarized historical performance of the Target of Opportunity Program. On average, OCD has awarded around \$1 million annually for the completion of six projects. Typical projects include downtown building rehabilitation, senior centers, homeless shelters, emergency infrastructure projects, demolition, and non-profits serving limited clientele populations. New applications will be reviewed to ensure alignment with Agency priorities.

OCD is reviewing pre-applications and opening full applications for downtown revitalization projects. Application review will start soon by order of submission. Approximately \$1 million is available.

Ms. Laffitte summarized common pre-application deficiencies; differences between area and spot slum and blight, administration allowances, eligible applicants, and budget rounding.

Ms. Oakley reminded participants to use RLF dollars for small projects rather than applying for new funds and as leverage for competitive awards. Ohio communities hold approximately \$20 million in local accounts and those funds need to be expended.

State of Ohio Priorities

Ms. Oakley reviewed how existing CDBG resources can be used to further State of Ohio investment priorities.

Planning: CDBG funds can be used for asset management inventories, feasibility studies, and comprehensive and strategic plans in low- and moderate-income (LMI) areas or that address LMI populations or alleviate blighting conditions. Sherry Loos, with the Rural Community Assistance Program (RCAP), explained the state statute requiring communities to develop asset management plans for water and wastewater systems and RCAP's role in assisting communities comply. Participants agreed few communities have funds to undertake planning and acknowledged it is an important tool to prepare for the future. Participants responded positively to OCD making Target of Opportunity funds available for planning.

H2Ohio and Lead Abatement: Support failing wastewater and water supply systems across Ohio, particularly in economically disadvantaged areas throughout the state and reduction of lead contamination.

Ms. Oakley informed participants that Environmental Protection Agency (EPA) is drafting revisions to the federal lead and copper rule, which may require an inventory and replacement of lead pipes, and additional testing. EPA and the Department of Housing and Urban Development (HUD) have partnered to provide guidance and have developed a resources website. Ms. Oakley reminded participants CDBG funds can be used to replace lead distribution lines and lead service laterals for LMI communities and households. Committee members stated that communities don't have the funds to inventory infrastructure for lead or copper, but most aging communities likely have contaminated lines. Funds for replacement will also be difficult to access as costs will outweigh resource availability. Participants suggested lead be considered a documented health hazard for Residential Public Infrastructure application rating.

OCD is also working with the Ohio Department of Health to identify properties with lead hazard control orders. OCD funds can be used to demolish these properties.

RecoveryOhio: CDBG funds can be used to support the mission of recovery from opioid addiction. Ms. Oakley reviewed eligible uses including emergency monthly housing payments, job training, education, drug abuse counseling and treatment, health care, childcare, and services for homeless

persons, and assistance for recovery treatment centers and health clinics. Ms. Oakley shared that HUD is encouraging communities to evaluate their current use of CDBG funding through stakeholder meetings to re-prioritize projects to meet the greatest need.

Ms. Oakley also shared information about The Support for Patients and Communities Act, which was signed into law October 24, 2018. The bill provides funding for temporary housing for individuals in recovery from a substance abuse order. Ohio expects to receive five percent of the \$25 million federal allocation. OCD will work with Ohio Mental Health and Addiction Services to implement the funding when it is appropriated. Participants acknowledged the opioid crisis but stated they don't often work directly with effected populations.

Residential Public Infrastructure Program

Wes Watkins shared historical data with the committee, including number and state-wide distribution of projects funded and the amount of funds awarded. The grant ceiling was increased to \$750,000 for PY 2018. As a result, all grant funds were awarded by the June 30, 2019 program year end. Participants stated the increased availability of grant funding per project is necessary due to the high costs of infrastructure, amount of pipe required to reach unserved areas, and the LMI areas the program serves. Committee members expressed a willingness to move projects to the following fiscal year if all current year funds are expended.

The committee discussed timing of grant funds. EPA awards principal forgiveness based on Median Household Income data, which is updated annually. Therefore, moving projects from one year to the next may impact the amount of grant funds available.

Mr. Watkins explained OCD will consider readiness to proceed, timing requirements of leveraged funds, and documented health hazards to prioritize projects if funds are low.

Meeting participants requested OCD consider engineering inspection reports, infiltration and inflow studies, and water line breaks as documented health hazards and add points to the rating system for functional obsolescence. Several committee members expressed that requiring a community be under findings and orders to receive funding was the equivalent of awarding bad behavior. Communities are using local resources to make temporary corrections to avoid EPA citation rather than saving resources to secure grant funding and implementing a permanent solution.

Mr. Watkins requested program practitioners submit revised scoring matrices for OCD consideration. OCD plans to revise the rating system for PY 2020 with regionalization, sustainability, affordability, lead abatement, and health hazards as priorities.

Mr. Watkins asked if \$100,000 was an appropriate amount of funding for household connections given requirements to connect households to sanitary sewer service and concerns about lead services laterals. Committee members stated that the amount of assistance required varied greatly for each project and asked that OCD allow flexibility to move funds between public facilities and household connections during the grant period.

Economic Development/Revolving Loan Fund

Ben Kepple presented historical program performance data, including grants awarded, funds awarded, and low- and moderate-income (LMI) jobs created, for PY 2018 and PY 2019 to date. In response to a participant's inquiry, Mr. Kepple shared that the demand for infrastructure and loan projects remained almost a 50/50 split over the last few funding periods.

Mr. Kepple explained OCD is working on two documents to guide both local government and business applicants through job creation requirements. The first is a policy notice that includes methods for certifying job creation. The second is a one-pager for businesses to assist in determining whether the project is a good fit for the program. Committee members stated that additional guidance is appreciated. However, they acknowledged not every business expansion is appropriate for CDBG assistance and that it will always be difficult for businesses to understand, comply with, and document LMI job creation.

Jared Jodrey provided data from the past three years of the Revolving Loan Fund program; waivers, economic development loans, and jobs created. Mr. Jodrey explained OCD is still working to move RLF reporting to OCEAN/Salesforce.

Training

There has been a lot of turnover in local government grant administrators. OCD scheduled implementation basics training sessions for November 18 and November 20, 2019. Ms. Oakley stated the training sessions are for administrators with less than two years of experience and encouraged participants to attend or send new staff from their communities.

The meeting adjourned at 3:30 p.m.



**PY 2020 Ohio Consolidated Plan
Fair Housing and New Horizons Program
Advisory Committee Meeting**

**Vern Riffe Center for Government and the Arts, Columbus, Ohio
October 28, 2019
1:00 p.m. - 3:00 p.m.**

Advisory Committee Members in Attendance:

Kelan Craig, Ohio Housing Finance Agency (OHFA)
Michelle Hyer, Buckeye Hills Regional Council
Kris Keniray, Housing Research and Advocacy Center
Evelyn King, City of Cambridge
Julie Kiser, Ohio Regional Development Corporation
Jimmy Russell, The Ability Center of Greater Toledo
Joe Maskovyak, Coalition on Homelessness and Housing in Ohio (COHHIO)
Marie Flannery, The Fair Housing Center
Karen Sprague, Gallia County
Nicholas Coggins, Trumbull County Planning Commission
Angie McConnell, WSOS Community Action
Sean Brooks, Hocking Athens Perry Community Action

Ohio Development Services Agency (ODSA) Employees:

Timothy Allen
Sheilah Bradshaw
Ian Thomas
Matthew LaMantia
Michael Frazier

Others in Attendance:

Zach Reizes, Hocking Athens Perry Community Action

Overview: Office of Community Development Fair Housing Actions

Tim Allen presented an overview of the Office of Community Development's (OCD) ongoing fair housing actions including:

Fair Housing Training for OCD local government grantees

OCD includes fair housing presentations in grant application and implementation training events, and offers individual grantee training upon request.

OCD's Civil Rights and Fair Housing Technical Assistance webpage

OCD provides an extensive collection of training and technical assistance materials on its [Civil Rights and Fair Housing](#) webpage. Specific topics include:

- Fair Housing Basics
- Civil Rights Technical Assistance

- Affirmatively Furthering Fair Housing (AFFH)
- Analysis of Impediments
- Accessibility and Reasonable Accommodations and Modifications
- Section 3
- State of Ohio Fair Housing

OCD also maintains a list of local government grantee fair housing contacts on the Civil Rights and Fair Housing website. The Ohio Fair Housing Contacts List is updated annually and includes all local governments with active, federally-funded OCD grants.

Standard Fair Housing Program

The Standard Fair Housing Program is a community-based framework of analysis, outreach, training, and technical assistance that serves to affirmatively further the purposes of the Fair Housing Act. Through this program, local governments actively promote fair housing by appointing a local contact, analyzing impediments to fair housing choice, and providing targeted public education. Local government recipients of Community Development Allocation and Community Housing Impact and Preservation (CHIP) Program grants must fulfill Standard Fair Housing Program requirements.

Grant Application Review and Grant Agreements

Local governments submit Standard Fair Housing Program proposals with Community Development Allocation and Community Housing Impact and Preservation (CHIP) Program grant applications. OCD's Civil Rights Compliance Specialist reviews Standard Fair Housing Program plans and provides technical assistance. Community Development Allocation and CHIP Program grant agreements include special conditions regarding Standard Fair Housing Program requirements and the grantee's obligation to affirmatively further fair housing.

Monitoring of OCD Grants

OCD monitors all of its grants for compliance with program requirements, including completion of approved Standard Fair Housing Program plans.

Analysis of Impediments to Fair Housing Choice

Local government recipients of Community Development Allocation and CHIP Program grants conduct an Analysis of Impediments to Fair Housing Choice (AI) as part of the Standard Fair Housing Program. OCD reviews local government AI documents and compiles data regarding locally identified impediments to fair housing choice to inform the statewide AI that is submitted to HUD with the Ohio Consolidated Plan.

New Horizons Fair Housing Assistance Program

The New Horizons Fair Housing Assistance Program is a competitive program that provides funds to units of local government to affirmatively further fair housing and eliminate impediments to fair housing. Activities funded with New Horizons grants must be in addition to a grantee's Standard Fair Housing program, which is required as a part of the Community Development Program and Community Housing Impact a Preservation (CHIP) Program applications. New Horizons fair housing strategies are based on locally assessed needs, and further the State's initiative to affirmatively further fair housing.

Fair Housing / New Horizons Consolidated Plan Advisory Committee

As part of the citizen participation process for the Ohio Consolidated Plan, OCD convenes a Fair Housing/New Horizons Advisory Committee each year. The committee meeting is open to the public and OCD draws committee members from fair housing organizations, the Ohio Civil Rights Commission, Coalition on Homelessness and Housing in Ohio (COHHIO), Ohio Housing Finance Agency (OHFA), entitlement and non-entitlement local governments, and advocacy organizations. The annual meeting provides an opportunity for a wide array of stakeholders to engage in productive

discussion regarding OCD's programs, fair housing requirements, and training efforts. The committee also discusses the state of fair housing in Ohio, and offers recommendations on how OCD can enhance training and outreach to address specific issues.

Grantee Training and Oversight

Tim described the fair housing training opportunities offered to OCD local government grantees. Individual grantee training is available upon request, and OCD includes a fair housing component in the grant application and implementation training events associated with the Community Development Program and Community Housing Impact and Preservation (CHIP) Program. During PY 2019, OCD's Civil Rights Compliance Specialist provided fair housing training during targeted training visits to communities with new grant administrators.

On December 12, 2018, OCD delivered a fair housing presentation during its one-day Community Development Block Grant (CDBG) Implementation Training for Allocation Program grant recipients.

At the April 22, 2019 Community Development Allocation Program Application Workshop, staff provided training regarding the Standard Fair Housing Program requirements.

In November and December 2019, OCD intends to host three targeted Community Development Allocation Program implementation workshops for new grant administrators. These workshops will include fair housing training.

Tim discussed the Fair Housing File Guide and Monitoring Tool, two of OCD's primary tools for grantee guidance and oversight. The File Guide provides a detailed outline of the documentation requirements for the Standard Fair Housing Program, and the Monitoring Tool directs OCD's oversight efforts. Basic Standard Fair Housing Program monitoring is a required component of the Community Development Program monitoring conducted by OCD staff. The Civil Rights Compliance Specialist also conducts targeted specialist monitoring.

Local Government Grantee Fair Housing Requirements

Tim discussed the required Standard Fair Housing Program for OCD local government grantees. Each local government grantee must certify that it will affirmatively further fair housing, and the Standard Fair Housing Program is the primary mechanism through which local governments fulfill this obligation. Standard Fair Housing Program requirements are incorporated into the Community Development Allocation Program and CHIP Program applications.

Tim outlined the four components of the Standard Fair Housing Program – education, outreach, analysis of impediments, and a local contact - and asked the committee for comments and suggestions regarding the effectiveness of the program.

Local Fair Housing Contact

The local fair housing contact is a local government employee who provides general information, receives and processes fair housing complaints, and refers cases to the Ohio Civil Rights Commission. A qualified consultant or local agency may serve as the local fair housing coordinator, upon OCD's written approval. The contact's name, address, and phone number must appear in all fair housing materials and on the grantee's official website.

Education

The Standard Fair Housing Program provides essential education regarding discrimination and fair housing rights. Local governments design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations, or civic groups schools (per calendar year during the grant period).

Outreach

To reach a broad community audience, local governments also develop an annual plan to distribute fair housing brochures, pamphlets, posters, and other informational materials to 10 area agencies, organizations, or public events each quarter during the grant period. Grantees must also provide fair housing outreach materials on their official website.

Analysis of Impediments to Fair Housing

To help target education and outreach efforts, local governments must conduct a comprehensive analysis to identify impediments to fair housing choice within their jurisdiction. The analysis should identify policies, actions, omissions, or decisions that restrict housing choices on the basis of the seven protected classes listed in the Fair Housing Act and the two additional classes included in Ohio's Fair Housing Act (ORC 4112). Local governments use the Analysis of Impediments to Fair Housing Choice (AI) to develop strategies to address and overcome discriminatory policies and practices. Local government grantees generate a new AI every five years, and in the intervening years provide an annual update. All local government grantees submitted comprehensive AI documents on July 1, 2019.

The State of Ohio compiles and analyzes data regarding locally identified impediments to fair housing choice to inform a statewide AI that is submitted to HUD with the Ohio Consolidated Plan. The next statewide AI is due in May 2020.

The committee agreed that the Standard Fair Housing Program format is comprehensive and working well, and recommended no changes at this time.

New Horizons Fair Housing Assistance Program

Tim described the New Horizons Fair Housing Assistance Program (New Horizons) application and instructions. New Horizons is a competitive program that provides funds to units of local government, or consortia of units of local government, to affirmatively further fair housing and eliminate impediments to fair housing. Activities funded with New Horizons grants must be in addition to a grantee's Standard Fair Housing Program. OCD provides New Horizons application information on the OCD Civil Rights and Fair Housing webpage, and staff promotes the program at Community Development Allocation Program and CHIP Program training events.

OCD allocates \$50,000 of CDBG funds each year for the New Horizons Program. Grant recipients may receive up to \$15,000 for one jurisdiction, and up to an additional \$5,000 for each additional eligible jurisdiction in a consortium, for a maximum award not exceeding \$30,000. Applicants must be direct Allocation Program cities or counties. Per a recommendation of the PY 2018 Advisory Committee, consortium members may now be direct Allocation Program cities or counties, or CHIP Program CDBG-eligible jurisdictions.

Tim described a potential New Horizons Program project that arose from a conflict between local zoning ordinances and a recovery housing property. Analysis of zoning laws is an eligible New Horizons activity, and Tim has encouraged the interested OCD grantee to consider applying for grant funds to conduct a county-wide zoning analysis. Considering that the most recent New Horizons grant

award was in PY 2016, Tim opened the meeting for a discussion of potential projects. The committee discussed the following issues:

- “Conservation districts,” created as zoning ordinances to preserve neighborhood character, that place restrictions on rental housing.
- “Nuisance ordinances,” especially as they pertain to cases of domestic violence and medical emergencies associated with persons with disabilities.
- Landlords renting under the guise of Airbnb to circumvent fair housing requirements and landlord/tenant law. Some jurisdictions have ordinances regarding the number of days required to establish tenancy.
- New Horizons funding to implement aspects of AI action plans.

State of Ohio Analysis of Impediments to Fair Housing Choice

Tim provided an overview of the status of HUD’s Affirmatively Furthering Fair Housing requirements. On July 16, 2015, HUD published the Affirmatively Furthering Fair Housing Rule, which introduced the Assessment of Fair Housing (AFH) process. The AFH replaced the Analysis of Impediments to Fair Housing Choice, and HUD committed to creating separate assessment tools for states, local governments, and public housing authorities. In May 2018, HUD withdrew the only operational assessment tool, the Local Government Assessment Tool, and outlined its intent to amend the existing AFFH regulations. Until HUD publishes revised AFFH guidance, program participants must continue to perform an Analysis of Impediments to Fair Housing Choice.

The AI documents submitted by local government grantees on July 1, 2019 will inform the State of Ohio’s next Analysis of Impediments to Fair Housing Choice, which is due May 2020. Tim presented preliminary data regarding grantee-identified impediments.

- The State of Ohio identified four primary impediments in its 2015 AI:
 - Lack of affordable rental housing for individuals with disabilities
 - Lack of affordable, accessible housing for older adults
 - Lack of education or understanding of Fair Housing laws by Hispanic Ohioans, especially in northern and northwestern Ohio
 - Limited access to public transit in rural areas
 - In 2019, these four issues remained important to grantees, with 51% citing a lack of affordable rental housing for individuals with disabilities; 26% citing a lack of affordable, accessible housing for older adults; 7% citing language barriers (Spanish); and 38% citing limited access to public transit in rural areas.
- The table below offers a preliminary summary of grantee-identified impediments in 2019:

Impediment	Percent of grantees
Lack of affordable housing	74%
Need for Fair Housing education	72%
Lack of accessible housing	56%
Lack of affordable/accessible housing for individuals with disabilities	51%
Lack of public transportation	38%
Lending issues (e.g. predatory lending, discrimination, lack of financial literacy)	28%
Lack of affordable/accessible housing for seniors	26%

Impediment	Percent of grantees
Exclusionary Zoning	25%
Poor condition of housing stock	21%
Fair Housing Enforcement	19%
Lack of building codes/code enforcement	13%
Lack of transitional housing	13%
Lack of understanding/failure to make reasonable accommodations/modifications	12%
Lack of housing for larger families	8%
Language barriers (Spanish)	7%
Lack of employment opportunities	7%
NIMBY	6%
Segregation	5%
Discriminatory advertising practices	4%
Lack of public infrastructure	4%

Committee members offered the following comments regarding the preliminary data:

- A committee member was surprised that lack of public infrastructure wasn't identified as an impediment by more grantees.
- A committee member wondered why the issue of fracking and its impact on housing was not considered by grantees.
- A committee member indicated that many of the impediments in the preliminary list could be grouped together.
- A committee member was surprised that NIMBYism wasn't more universally identified as an impediment by grantees.
- A committee member suggested that OCD further evaluate the significance of the grantee-identified impediments by conducting a survey which asks grantees to rate the impact of each impediment in their community.

Other Issues and Recommendations

Tim opened the meeting to general comments or recommendations from the Committee:

- A committee member mentioned that individuals who provide fair housing training in grantee jurisdictions need guidance/training on how to deliver effective fair housing presentations.
- A committee member noted that local governments should consider using social media as a fair housing education/outreach tool.
- A committee member noted that urban jurisdictions often permit large housing projects that are not in compliance with the Fair Housing Act.
- A committee member noted that the state's building permit authority does not effectively enforce ADA requirements, and further noted that aspects of the Ohio Revised Code prevent the state and local jurisdictions from "mandating accessibility."

The meeting adjourned at 3:00 p.m.



**Program Year 2020 Ohio Consolidate Plan
Community Housing Impact and Preservation (CHIP)
Program Advisory Committee Meeting**

**Ohio Emergency Management Agency
2855 W Dublin Granville Road, Room #104, Columbus, Ohio 43235
9:30 a.m. to 3:30 p.m.**

Attendees:

Advisory Committee Members:

John G. Belt	Dale Hartle	Kenny Vigneron
Jeremy Boggs	Kristie Tidd	Amy Coursen
Bobbie Conrad	Kim Haught	Terri Fetherold
Karen Sprague	Barry Strahorn	Chris Wojno
Rebecca Hall	Liz Keel	Tanya Sargent
Gayle Flacynski	Whitaker Wright	Marti Grimm
Scott Hillis	Missy Frost	Nicholas Coggins
Terry Jacobs	Ryan Miller	Dianne Guenther
Dawn Gates		

Ohio Development Services Agency (ODSA) Employees:

Barbara Richards	Matt LaMantia
Shana Garrett	Marvin Rudd
Teressa Hickson	John Saunders
Bill Bope	Ian Thomas

Others Present:

Brandon Hines	Dennis Miller
Phil Taylor	Larry LaPrade

Welcome and Introductions

Barbara Richards opened the meeting with introductions. All committee members introduced themselves.

Program Update

Barbara reviewed Program Updates for the CHIP Program

- PY-2018
 - CHIP Program Annual Performance Report was distributed to all attendees.
 - First milestone for 50% committed and 25% draw will be at the end of the month

- PY-2019 CHIP Program Funding was reviewed.
 - Received 35 applications
 - 31 Applications were funded
 - First Milestone ER on January 1, 2020
- Outcomes
 - Outcome memo on Technical Assistance website which allows flexibility on meeting projected outcomes however if a grantee returns significant money it will be scored negatively.

Ohio Department of Health Lead Program

John Belt with Ohio Department of Health reviewed ODH Lead Programs and information.

- Main Number: 877-LEAD-SAFE for Lead Hazard Control Grant
- \$12 million in new funding for lead hazard control
- Lead Hazard Control for LMI-Medicaid \$5 million
- Lead Hazard Control for LMI City of Toledo-Historic District South \$150,000
- Middle Income Lead Hazard Control \$150,000
- Housing Demolition through OHFA \$150,000
- Lead Training through ODSA \$225,000
- ODSA developing MOU for training with ODH and will subsidize licenses
- Ohio Income Tax Credit through ODH \$5 million for up to four units (\$10,000 per unit)
- City of Cleveland \$1 million through Lead Safe Cleveland
- WIN Grant for Water testing-\$1.3 million-Hamilton County and Cuyahoga County Partners
- HEPA Vacuum loaner program-approximately 60 around the state
- Plan for continued efforts and next steps: Tax Credits, Lead Hazard Control, and Lead Training
 - Over \$25M a year for Lead Abatement in Ohio over the next three years!
- New Clearance Standards in January 2020 for USEPA Lead Clearance Standards and ODH Lead Hazard Clearance Standards

Senate Bill 255- Home Inspectors

Barbara Richards spoke about Senate Bill 255

- Senate Bill 255 requires all Home Inspectors to be licensed
- ODSA legal department has determined it should not affect the CHIP Program
- We will forward information as we receive it
- Governor is in control of the committee to discuss its impact

CHIP Program Proposed Topics of Discussion

The following CHIP Program topics were discussed:

- Finance Mechanisms
Barbara discussed OCD is considering updating the Finance Mechanism to require all Rehabilitation project decline to zero; eliminating recaptured funds. The following were all points made by the committee:
 - There was a question regarding all the old mortgages and how they would be treated.
 - Tracking mortgages is an administrative burden.
 - Several attendees stated the program income helps additional clients
 - Equity built in home as apposed to 2-3 small projects????
 - A comment was made that it takes multiple years of HOME PI to have enough to do one project
 - Communities like to prevent windfalls for clients
 - The elderly shy away from rehabs because they don't want mortgages on their homes
 - It should be a point in time and do not release old mortgages
 - OCD will check any statute of limitation laws- does a mortgage have to be acknowledged every 8-years?
 - There is need of some guidance on death situations, maybe release on death
 - Provisions for transferring properties

- Having a mortgage prevents a windfall
- A consensus of agreement that five years was a reasonable affordability period
- Maybe we should allow the clients to pay to release mortgages
- Milestones
A discussion was held on milestones. The following were all points brought up by the committee:
 - 50% committed 25% drawn, should change to 40% committed and 20% drawn.
 - Drawing funds is more of an issue than meeting commitment milestones
 - First year milestones are more difficult because of gearing up and the winter season
 - PY19 last milestone is 100% committed and 50% drawn
 - Client complaints have increased. Speculation of contracts being signed to meet milestones then work does not start for 6-months to a year.
 - Consensus on one free amendment was thumbs up
- Limits of Assistance
Discussion regarding the limits of assistance and the need to increase brought of this feedback:
 - Lead issues increase costs significantly
 - Raise maximum limits based on cost of living, 3% annually
 - Scale projects based on lead safe, lead abatement, septic, etc.
 - Raise maximums to at least \$50,000 to \$60,000
 - Relocations cost are going up too.
 - Contractors that must travel and therefore charge more.
 - Please consider granting exceeds requests as a blanket approval to exceed verse a flat amount which could result in the grantee to requesting permission multiple times.
- Collaboration Incentives
 - Second year is more difficult to collaborate because of timing issues
 - OCD should allow extensions based on collaboration with a third-party/grant source.
 - OCD should allow grantees to exceed \$46,000 maximum (went over outcomes memo)
 - Describing these scenarios in the application may be helpful
 - Allow extensions at the end of the grant could help to encourage collaboration
- Client Complaints
 - Initial, interim, and final inspections are critical to ensure projects are successful.
 - There must be frequent communication with the clients
 - The specifications must be clear and separated so customers' expectations are clear.
 - Discussion regarding awareness of how grantees are speaking to/or presenting information to clients was reviewed.
- Contractors, Contractors, Contractors
The Contractor discussion was incorporated into the Training and Recommendations discussion below.
 - Issues
 - Recruitment
 - Qualifications
 - Obstacles

Training Contractors, Workforce and More...

The Training discussion lead by Shana Garrett was very productive. The committee had many discussion points and feedback as outlines below.

- Training Needs and Recommendations
 - Income determination training is available on the HUD website
 - Strong need for full rehabilitation specialist training

- Initial inspection
 - Specification Writing
 - Interim inspections
 - Final inspections
 - Customer-contractor relations
- RRS training and Inspection licensing
- In-person training is preferred over webinar training
- Possible using lead training funds to pay for rehabilitation specialist training
- Any training should be broken down into small sessions
 - RRS
 - Steps to conduct appropriate inspections
 - Paperwork
 - Customer-client relations
- HWAP inspectors go through intensive training- Could Rehabilitation specialist utilize same “track” through COAD?
- GLCAP has a good training program
- Instead of having the rehab specialists type up their own paperwork have an administrator do it
- Should OCD put together “Introduction to Rehabilitation Specialist” manual for new employees?
- QCI (Energy Auditor) five-day course-could be a helpful resource
- Would like for the Housing Conference to come back
- Workforce Development Roundtable
 - Contractors
 - Rehabilitation Specialist
 - Resources available for workforce development (career centers, unions, recovery centers, trade programs)
 - Using funds as a line of credit to reduce delays
 - All new contractors to have money up front
 - Slow payment, no upfront payments, RRP requirements, and RRS requirements cause issues
 - Contractors can make more money doing something else in the private sector (insurance claims, etc.)
 - RRP rules are required by all contractors but are not always enforced
 - What about crew-based contractors?
 - What about Youth Built or other sources of workers
 - Trade Schools and RCO training
 - Technical Credit \$2,000 per certification

Other Issues/Comments/Questions

- Young people get trained through contractor then go to union jobs after a couple of years because of the pay increase

No comments from of Other Members of the Public.



**Program Year 2020 Ohio Consolidate Plan
Housing Assistance Grant
Program Advisory Committee Meeting**

**Ohio Emergency Management Agency
2855 W Dublin Granville Road, Room #104, Columbus, Ohio 43235
October 4, 2019
9:30 a.m. to noon**

Attendees:

Advisory Committee Members:

Martina Grimm	Kellie Ailes	Jennifer Atwell
Bambi Baughn	Ian Beniston	Andrew Binegar
Terry Boehm	Nina Creech	Glen Crippen
Kerri Brammer	Kelly Feeney	Helen Fisher
Roger Carney	Joe Gage	Marla George
Teresa Cook	Kevin Hannahs	Donnald Heckelmoser
Nina Keller	Ash Lemons	Toni Morgan
Kimetta Parker	Melissa Pearce	John Peoples
Diana Roush	Bernard Salzman	David Shea
Jodi Sime	Kenny Vigneron	

Ohio Development Services Agency (ODSA) Employees:

Barbara Richards	Bill Bope
Shana Garrett	Marvin Rudd
Teressa Hickson	

Others Present:

Jennifer Evans	Mike Grimes	Jessica Donovan
Jossep M	James Russell	Tim H
Linda Pugh	Jamie Mundy	

1. Welcome and Introductions

Barbara Richards opened the meeting with introductions. All committee members introduced themselves.

2. Program Update

Barbara reviewed Program Updates for the HAGP Program
PY-2018 Housing Assistance Annual Performance Report

3. Housing Assistance Grant Program Proposed Topics of Discussion

The following HAGP Program topics were discussed:

Project Eligibility

Income Eligibly

- Income Calculations
- Income Documentation
 - Different funding sources have different income eligibility requirements
 - HWAP looks back 12 months and is tied to utility programs that provide match
 - Look back six months from application date to determine 50% limit met
 - Q: Does OCEAN calculate income levels for each County? No. The HUD website and OCD TA site have the income levels for the counties available.
 - ORC mandates that OHTF programs limit recipients to income 50% AMI. However, there is some flexibility on an overall percentage of recipients must be at or below 50% of AMI. Therefore, Development allows DPA is limited to 65% of AMI
 - OCD will continue to evaluate the best method to determine income for the program
 - Title 3B is 60%. Q: Can it be used to match HAGP. A: Yes, if under 50%
 - HOME guidelines used unless other funders require something different
 - We need to know what source documentation is required to substantiate income
 - Whatever method you choose you need to maintain consistency throughout the grant

Types of properties

- Allowed (i.e. owner-occupied single-family home)
- Not allowed (i.e. can tenant occupied properties be assisted with Accessibility grant with landlord approval)

Single Family, Duplex

- Single Family, owner occupied units are primary eligibility
- Q: Are duplexes allowed to be worked on? A: Single Family is defined as four units or less
- Common areas are eligible
- Contact representative for specific questions
- Multiple unit issue remedied by Individual parcel designation Landlords that are 50% AMI may be eligible to receive assistance on their half of a duplex as well.

Rentals-not currently

- A few participants have received requests from renters
- Landlords are required to make reasonable accommodations
- Renters request more than accessibility
- Committee suggests only allowing accessibility issues only on rentals
- Several attendees indicated they would do rental accessibility requests if allowed
- Program allowing Rental assistance must be approved by OHTF advisory board

Mobile Homes

- Mobile homes where land is not owned can do ramps, furnaces, correct electrical issues, and repair leaking roofs.
- OCD (RRS) has no restriction on home repairs to mobile homes
- Only do the inside of mobile homes, no exteriors that may benefit the landowner You can do exterior repairs such as repairing roof leaks, and repairing electrical issues, and replacing a window or door in some cases.

Other

- Aluminum ramps can be moved easily but have become expensive
- If there are two owners and only one occupant, you must get sign off from non-occupying owner

Types of eligible Activities/Repairs

- Eligible (i.e. Accessibility Modification, Heating Repair)
- Not eligible (i.e. Weatherization and Lead Abatement)
 - **Essential repairs** as opposed to emergency repair
 - Grantees have flexibility to define what an emergency is defined as
 - Repairs should be done to keep a person in their home
 - Should be defined as essential not emergency
 - Address to emergencies by prioritizing (i.e. furnace in the winter)
 - Keep person in their home physically and financially

Finance Mechanism

- Use 502 direct loan which is fixed over 30 years
- Q: Any variable rate loans A: No
- Q: Any loans on assistance A: No
- Assistance must be a grant. If funds are returned grantee must return to OCD
- **Loans** are used for DPA but are 100% forgiven over five years
- OCD will investigate options

Project Costs

- Administrative Costs (10% of Grant)
- Project Costs
- Project Delivery Costs
- Level of Assistance (\$7,500 for Repairs and \$3,000 for DPA)
 - If doing separate jobs on same address during the same grant period they must be combined
 - OCEAN will only allow an address to be set up once
 - Use cost allocation plan to document project delivery costs
 - OCD defines what administrative costs, soft costs, and project delivery costs are eligible
 - These are defined in the 2019 Application Instructions
 - 15% soft costs are a good percentage (\$6,375) 85% of \$7,500 would be the amount for hard costs
 - A request was made to increase administrative costs to 12-15%

Project Completion

- Crew based (in-house) program versus Contractors
- Contractor Bidding
- Contractor Recruitment and Qualifications
 - Can use crew based and/or contractors
 - Q: What is an acceptable amount of DPA? A: 5-\$10,000
 - Q: Is DPA a feeder for Home Repair Program? A: No
 - One grantee conducts home maintenance **classes** for DPA recipients
 - A request to increase maximum level of assistance was made
 - OCD will review allowing **waivers** to maximum level of assistance on a case by case basis
 - No participant stated they were walking away from requests
 - Almost always need matching funds on roof replacement because of costs
 - Some grantees don't do roofs
 - Same issue if doing ADA ramp and roof simultaneously
 - There was discussion about using price lists
 - OCD would like suggestions on recruiting contractors to the program
 - All contractors require EPA **RRP** certification, insurance, etc. This is a federal regulation. Fines are high.

- OCD subsidizes training to get RRP certified
- Q: Does a nonprofit have to be a certified firm? A: **The EPA requires contractors to become a certified firm.**
- The nonprofit is required to vet the contractors to insure they are qualified to work on projects.

Matching Funds

- Matching Funds verses Leverage Funds
- ODSA Funds as a Match
 - See handout, moving forward with 2018-2019
 - Your organization's match amount should dictate the amount you request
 - You do not have to match each project. Simply show aggregate on your FPR

Lead Regulations: EPA vs HUD

- Request made to not use federal guidelines relative to lead
- CHIP rules do not change
- EPA requirements are required for HAGP projects
- All workers must be EPA certified
- The guidance will outline required documentation
- There must be one certified worker on the job whether a contractor **or** in-house staff
- OCD subsidizes training for RRP **the RRS requires every crew member be a certified RRP worker.**

4. Training Needs and Recommendations

The following needs and recommendations were discussed:

- Application due date OCTOBER 2, 2020 in order to get grant agreements out by March 1, 2021
- Committee agreed this is a workable update to the due date.

5. Other Issues/Comments/Questions

- Passport pays \$3,500 a month for nursing home costs
- Keeping elderly out of nursing homes is much cheaper
- Spend money to save money
- OCS would like human interest stories to illustrate impact of the HAGP
- OCD will explore using a Twitter account to share stories

6. Comments of Other Members of the Public

None.

Comments provided prior to the meeting by stakeholders

I will not be in town to attend the meeting on the 4th but I do have a few items I would like to share.

- The HAGP is currently funded as one activity. We have the ability to record all expenses to this one activity (admin and operating). I would like to see this continue. If we are required to break down the grant by multiple activities, this results in more work in tracking and recording expenses by our finance departments.
- There has not been an administrative cap placed on the grant. Please allow the grant funding to continue as it has for over 20 years.
- I understand many organizations hire outside contractors to perform the work under the program. There are still organizations that perform the work in-house. This process makes it much harder to distinguish specific hard and soft costs because exact pay amount for laborers etc. are not known until sometimes almost three weeks later when payroll is posted. By requiring things like

additional funded activities within the grant and separation of hard/soft costs places an additional administrative burden on the program and the program has been working in this manner for over 20 years. By placing these types of stipulations on the grant funds, you also create additional areas for audit review during both program and financial audits by ODSA and our third party auditors.

- Please consider allowing match funding to be ODSA funded projects if the organization receiving the HAGP funds is not the same agency being awarded the match funds. For example: A local CAA could utilize CHIP funds (HOME and CDBG-not OHTF) awarded to a local community as match funds on a project where both grants provide funding.
- Consider providing guidance on income eligibility calculations. Example: Are you looking back 30 days and converting this to an annual income etc. We are all probably doing this a bit different.

I would like to discuss programs that operate a crew based (in-house) program without contractors and how it lowers hard costs (by eliminating contractor mark-up profit). This does raise soft costs (support) of the program, but allows a quicker response, lower overall job costs that translate into more housing units completed and more people served. Hope this makes sense and thanks for the opportunity provide feedback.

2020 HAGP topics I'd like to see covered or discussed:

- Types of properties allowed, not allowed under HAGP program (i.e. can tenant occupied properties be assisted with Accessibility grant with landlord approval)
- Aside from Home Weatherization and Lead Abatement what are a list of jobs that would not be eligible under the program
- Percentage of Admin. Cost allowed
- Any OCEAN updates

The meeting was adjourned at noon.

State of Ohio Analysis of Impediments

May 2020

Prepared By:
Ohio Development Services Agency
Office of Community Development

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Executive Summary

Ohio Fair Housing Law

The Ohio Fair Housing Law (Ohio Revised Code 4112.02(h)) gives all persons in the federally protected classes the right to live wherever they can afford to buy a home or rent an apartment. The Ohio law also adds two additional protected classes: ancestry and military status. According to Ohio law, it is unlawful, on the basis of race, color, religion, sex, national origin, ancestry, military status, disability, or familial status to:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property
- Discriminate against any person in the purchase, renewal, or terms and conditions of fire, extended coverage, of homeowners or renter's insurance
- Refuse to consider without prejudice the combined income of both spouses
- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation
- Deny any person membership in any multiple listing services or real estate broker's organization
- Discriminate in the selling, brokering, or appraising of real property
- Deny or make different terms for home loans, such as different interest rates, points, or fees

In addition, it is illegal for anyone to:

- Coerce, intimidate, threaten, or interfere with anyone exercising their rights granted under the Fair Housing Act or assisting others who are exercising that right
- Make, print, publish, or post statements or advertisements that a house or an apartment is available only to persons of a certain race, color, religion, sex, familial status, or disability

In Ohio, the Ohio Civil Rights Commission enforces state laws against discrimination. The Commission receives and investigates discrimination charges – on the basis of protected class – in the areas of employment, public accommodation, housing, credit and disability in higher education.

Federal Fair Housing Law

Title VIII of the Civil Rights Act of 1968, as amended, is also referred to as The Fair Housing Act. The Act prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

The Fair Housing Act covers most housing. In some situations, owner-occupied buildings with up to four units, single-family housing sales or rentals that did not use a real estate agent or

broker and housing operated by private clubs and organizations that only allow members to occupy units are exempt from the law.

The U. S. Department of Housing and Urban Development (HUD) is the federal agency charged with enforcing the Fair Housing Act. When an individual files a complaint, HUD will notify the complainant and will also:

- Notify the alleged violator of the complaint and allow the party to submit a response
- Investigate the complaint and determine whether there is reasonable cause to believe a violation occurred
- Notify the complainant if HUD cannot complete an investigation within 100 days of receiving the complaint.

HUD will try to reach an agreement with the alleged violator (respondent). The conciliation agreement must protect both the complainant and the public interest. If the respondent signs a conciliation agreement, HUD will take no further action on the complaint. If, however, HUD has reasonable cause to believe that the respondent breached the conciliation agreement, HUD will recommend that the U.S. Attorney General file suit.

HUD requires state and local government grant recipients to certify that they will affirmatively further fair housing as part of their consolidated planning process.

While not defined in statute, HUD describes the obligation to affirmatively further fair housing as a process consisting of three components:

1. Complete an Analysis of Impediments to Fair Housing Choice
2. Implement actions in order to overcome the identified impediments
3. Document the actions taken in order to overcome these impediments

Methodology

The process for the Analysis of Impediments is a comprehensive examination of data related to housing, affirmatively furthering fair housing, housing transactions/conditions and the fair housing program’s delivery system. The main sources of data for this report include 2014-2018 American Community Survey data and data collected from federal and state agencies that relate to demographic and housing characteristics within Ohio.

Jurisdictions in Ohio that receive funds from HUD directly are known as entitlement communities. These communities report to HUD. Data that contains information on these areas are identified. This report serves as the Analysis of Impediments to Fair Housing Choice for the State of Ohio’s non-entitlement communities, which are communities that do not have a direct relationship with HUD and receive funds from the State of Ohio (Table 1). The non-entitlement communities are the focus of this Analysis of Impediments.

Table 1: Ohio Non-entitlement Counties							
Adams	Clark	Fayette	Highland	Lorain	Morgan	Putnam	Van Wert
Allen	Clinton	Fulton	Hocking	Lucas	Morrow	Richland	Vinton
Ashland	Columbiana	Gallia	Holmes	Madison	Muskingum	Ross	Washington
Ashtabula	Coshocton	Geauga	Huron	Mahoning	Noble	Sandusky	Wayne

Athens	Crawford	Greene	Jackson	Marion	Ottawa	Scioto	Williams
Auglaize	Darke	Guernsey	Jefferson	Medina	Paulding	Seneca	Wood
Belmont	Defiance	Hancock	Knox	Meigs	Perry	Shelby	Wyandot
Brown	Delaware	Hardin	Lawrence	Mercer	Pickaway	Trumbull	
Carroll	Erie	Harrison	Licking	Miami	Pike	Tuscarawas	
Champaign	Fairfield	Henry	Logan	Monroe	Preble	Union	
Ohio Non-entitlement Cities							
Ashland	Chillicothe	Findlay	Marysville	New Philadelphia	Piqua	Tiffin	Xenia
Ashtabula	Defiance	Fremont	Medina	Niles	Portsmouth	Troy	Zanesville
Athens	Delaware	Marion	Mount Vernon	Norwalk	Sidney	Wooster	

Fair Housing Impediments

After analyzing the compiled data for the Analysis of Impediments to Fair Housing Choice, the state identified four impediments to fair housing. These identified impediments are the focus of the state’s action plan:

1. Lack of affordable housing

The statewide shortage of affordable housing limits housing choice and disproportionately impacts members of protected classes, particularly minority populations, families with large households, and individuals with disabilities.

2. Need for fair housing education

Non-entitlement local governments overwhelmingly indicate that citizens in their communities lack a basic understanding of fair housing rights. Local governments noted a strong need for improved education for the general public, local government officials, social service agencies and housing providers.

3. Lack of accessible housing

An estimated 14% of Ohioans identify as having a disability, and 64% of discrimination complaints in non-entitlement communities are based on disability (Table 9; Appendices 10-14). This suggests that individuals with disabilities may face a disproportionate difficulty in accessing suitable housing.

4. Limited access to public transit in rural areas

In Ohio, 34 rural transit agencies need to replace 25% of the existing fleet, which includes vehicles that have past their useful life and provide more services to low- and moderate-income individuals and older adults. Currently, 27 counties do not have any existing public transit services. By 2025, as Ohio’s rural population grows older and rely more on public transit, these counties will need to provide more than 4 million trips per year.

Section 1: State Overview

Ohio is the 7th most populous state in the nation with a total population of more than 11.68 million people. The state's population accounts for 3.6% of the nation's 327 million population. Since 2000, Ohio's population increased by 3% and current projections indicate that the state's population will remain level through 2040.

The median age in Ohio is 39.4 years compared to 38.2 years nationally. Since 2000, Ohio's median age increased by 3.2 years. Although the nation as a whole is aging, Ohio is aging at a faster rate. Of Ohio's total population, 17% is aged 65 years or older. In 2040, an estimated 19.9% of the state's population will be aged 65 or older.

Nearly 80% of the state's population lives in one of the state's 14 metropolitan areas. More than 31% reside in four northeast metropolitan areas: Cleveland, Akron, Youngstown and Canton. Central Ohio, which includes the Columbus metropolitan area, is home to 18% of the population and 22% live in three southwest metropolitan areas: Cincinnati, Dayton and Springfield (Map 1 and Map 2).

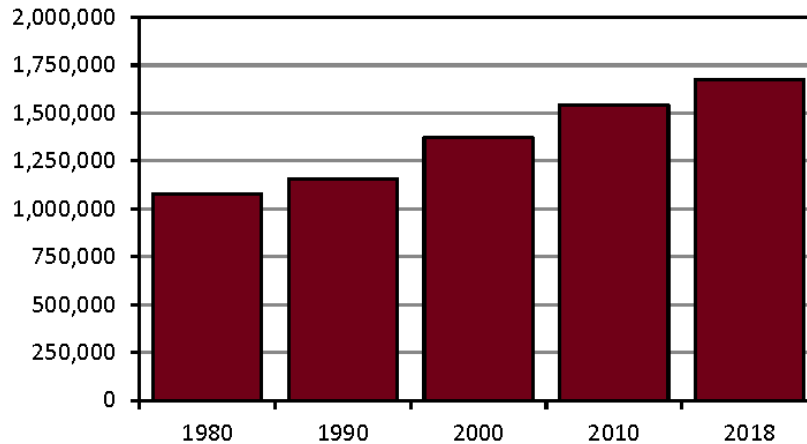
In 1965, the U.S. Congress identified counties in 13 states along the Appalachian Mountain Range as part of the Appalachian Regional Commission (ARC). In Ohio, 29 counties were named (Map 3). Mahoning, Ashtabula and Trumbull counties were added to the region in 2008 as part of the ARC reauthorization legislation. Their general location is along the Ohio River and the hill counties of southeast Ohio. Ohio's Appalachian region comprises 17% of the state's population. The Appalachian hills of southeastern Ohio are the least densely populated areas of the state. The largest city in Appalachian Ohio is Youngstown with an estimated population of 64,606 individuals. The region is 92.5% white. Although the state's overall population is expected to increase slightly by 2040, Ohio's Appalachian population is expected to decrease 4.6% by 2040.

Race and Ethnicity

Under federal fair housing laws, race, national origin and color are protected classes and Ohio also includes ancestry as a protected class in state law. Nationally, minorities comprise 40% of the population. In Ohio, minorities make up 21% of the total population. Ohio's total minority population increased 38% since 2000 and the number of immigrants in Ohio increased 63%, while the white, non-Hispanic population decreased 4% during the same time. In Ohio's Appalachian region, minorities comprise 8.7% of the total population.

For the United States taken as a whole, the African American population is more than 46.3 million, accounting for 14.1% of the nation's total population. Since 2000, the African American community in the U.S. has experienced an increase of more than 9.8 million persons, or 27%. Ohio's African American community is comprised of nearly 1.7 million people, accounting for 14.3% of the state's total population (Figure 1). Ohio's African American population in relation to the state's total population is comparable to the national average. In 1980 there were more than 1 million African Americans, comprising 10% of Ohio's total population. According to the 2018 American Community Survey, Ohio's African American population has increased by 22% since 2000. In Ohio's Appalachian region, African Americans represent 4.3% of the population.

Figure 1: African American Population in Ohio



Source: 2014-2018 American Community Survey

The majority of African Americans in Ohio live in urban areas. Four out of every 10 African Americans in the state live in the cities of Cincinnati, Cleveland, or Columbus. In Columbus there are 290,000 African American residents; 197,000 in Cleveland; and 133,000 in Cincinnati. The Cleveland metropolitan area alone is home to more than 25% of Ohio’s African American population.

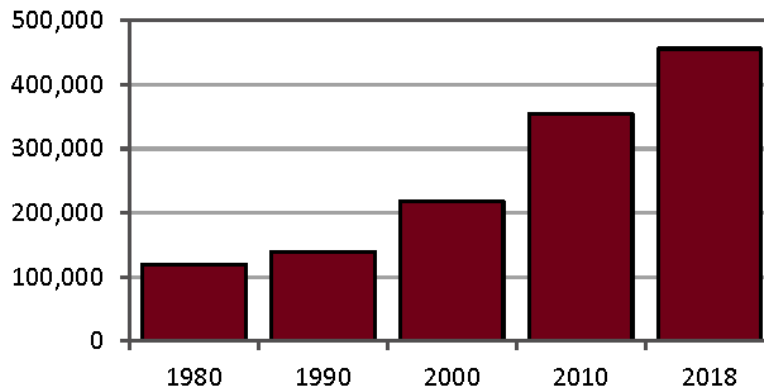
Total African American Population		Percent of County Population	
Cuyahoga	398,027	Cuyahoga	32.00%
Franklin	337,261	Hamilton	28.30%
Hamilton	231,144	Franklin	25.70%
Montgomery	123,419	Montgomery	23.20%
Lucas	97,192	Lucas	22.60%
Summit	90,178	Mahoning	17.70%
Mahoning	40,608	Summit	16.60%
Butler	39,954	Allen	15.00%
Stark	36,580	Erie	11.20%
Lorain	34,221	Clark	11.10%
Trumbull	19,467	Lorain	11.10%
Allen	15,413	Richland	11.00%

Source: 2014-2018 American Community Survey

More than 555,000 individuals in Ohio were born in other countries. There are more than 93,000 foreign-born African Americans living in Ohio. This constitutes 18% of all foreign-born residents, but the number is growing. Roughly 75% of foreign-born African Americans emigrated from Africa. Close to one-third of the African migration came from eastern Africa with a majority of the remainder coming from western Africa. Of foreign-born African Americans, more than 68% report speaking only English or English “very well”.

For the United States, taken as a whole, the Hispanic population is nearly 59.7 million, or 18.3% of the nation's total population. Since 2000, the number of Hispanics within the U.S. has increased by more than 24.5 million, or 69%. Ohio's Hispanic community is comprised of more than 456,000 people, accounting for 3.9% of the state's total population. In 1980 there were less than 120,000 Hispanics in Ohio, making up 1.1% of the state's total population. According to American Community Survey data, Ohio's Hispanic population has doubled since 2000 and more than tripled since 1980.

Figure 2: Hispanic Population in Ohio



Source: 2014-2018 American Community Survey

The majority of Hispanic Ohioans live in urban areas of the state. One out of every three Hispanic Ohioans live in one of four cities: Cleveland, Columbus, Lorain and Toledo. In Columbus there are 54,000 Hispanic residents, in Cleveland there are 47,000, in Toledo there are 25,000 and in Lorain, 19,000. The Hispanic population makes up a higher proportion of county populations in the north and northwest sections of Ohio, many of which are rural. In Ohio's Appalachian region, Hispanics represent 1.9% of the region's population.

Total Hispanic Population		Percent of County Population	
Cuyahoga	76,732	Defiance	10.30%
Franklin	74,816	Sandusky	10.20%
Lucas	31,642	Lorain	10.00%
Lorain	31,271	Fulton	8.90%
Hamilton	28,177	Henry	7.80%
Butler	18,601	Lucas	7.30%
Montgomery	16,460	Huron	6.90%
Mahoning	14,677	Putnam	6.40%
Summit	12,150	Cuyahoga	6.20%
Lake	10,737	Mahoning	6.20%
Stark	8,011	Wood	5.70%
Wood	7,432	Franklin	5.70%

Source: 2014-2018 American Community Survey

Much of the recent increase in Ohio's Hispanic population has occurred in the Mexican community, and it has more than doubled since 2000. The number of Hispanic Ohioans with an ancestral link to Mexico is more than 195,000; nearly 75% of these residents were born in the United States. Recent immigration from Mexico is an important factor in the growth in Ohio's Hispanic community with more than 10,000 people arriving from Mexico since 2010.

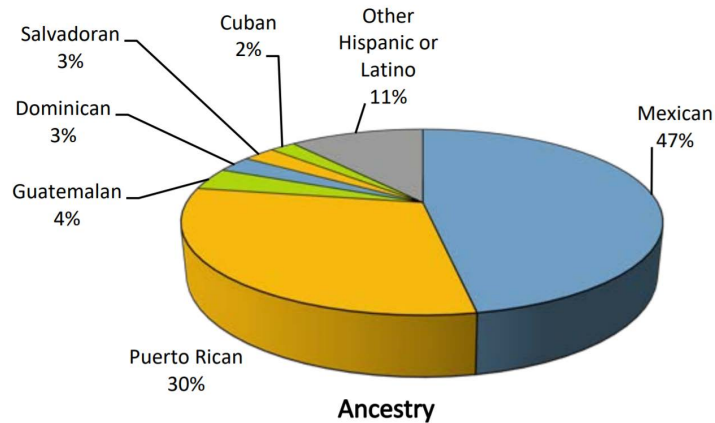
While the number of Ohio residents with Puerto Rican heritage has grown in recent decades, its portion of the Hispanic community has held steady at around 30% of Ohio's Hispanic population.

While Ohio residents with Mexican and Puerto Rican heritage make up a majority of Ohio's Hispanic community, Central America is becoming a more common point of origin. Hispanic Ohioans with ancestors in Central America have quadrupled since 2000, with a large portion having ties to Guatemala or El Salvador. More than half of all Guatemalans and Salvadorans in Ohio are immigrants.

A little more than 20%, or roughly 93,000, of Hispanic Ohioans are foreign born; more than 24,000 of these residents arrived in the past decade or so. Since coming to the United States 34% of foreign-born Hispanics have become naturalized citizens. The figure for Mexican migrants is slightly less at around 29%.

Of the Hispanic population, 80% speak only English or report speaking English "very well". Just more than half of the Hispanic population reports speaking Spanish at home.

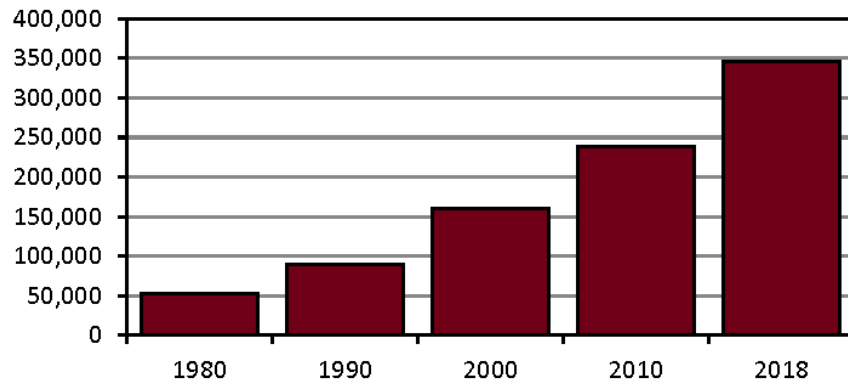
Figure 3: Hispanic Ancestry in Ohio



Source: 2014-2018 American Community Survey

As a whole, the Asian population is nearly 22.1 million, or 6.8% of the nation’s total population. Since 2000, the number of Asian Americans in the U.S. has increased by more than 10 million people, or 86%. Ohio’s Asian American community is comprised of more than 345,000 people, accounting for 3% of the state’s total population. In 1980 there were approximately 50,000 Asians in Ohio, comprising 0.5% of the state’s total population. Ohio’s Asian population has doubled since 2000 and is over six times higher since the 1980 count.

Figure 4: Asian Population in Ohio



Source: 2014-2018 American Community Survey

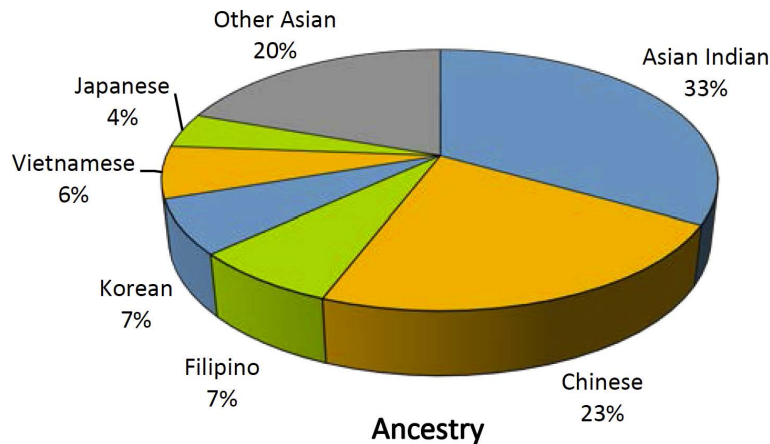
A majority of Asian American Ohioans live in the state’s metropolitan areas. Generally, Asian Americans in Ohio are as likely to live in the suburbs as the central city. The city of Columbus is an exception with more Asian Americans living in the city because of the influence of The Ohio State University. More than 65,000, or 19%, of Ohio’s Asian population live in Columbus. There are another 50,000 Asian American Ohioans living in the Columbus metropolitan area. The Cleveland-Akron metropolitan area has more than 92,000 Asian Americans residents. In Ohio’s Appalachian region, Asians represent .6% of the region’s population.

Total Asian Population		Percent of County Population	
Franklin	85,071	Delaware	7.90%
Cuyahoga	49,010	Warren	6.80%
Hamilton	28,461	Franklin	6.50%
Summit	23,980	Union	5.10%
Butler	16,330	Summit	4.40%
Montgomery	16,282	Butler	4.30%
Delaware	16,264	Athens	4.20%
Warren	15,705	Greene	4.20%
Lucas	10,003	Cuyahoga	3.90%
Greene	6,987	Hamilton	3.50%
Lorain	5,570	Montgomery	3.10%
Stark	4,895	Portage	2.60%

Source: 2014-2018 American Community Survey

Nearly 43% of Ohio's foreign-born population is from Asia. More than 105,000 of the nearly 345,000 Asian Americans in Ohio are of Indian descent. The Indian community is growing quickly and has expanded by 48% since 2010. Roughly half of foreign-born Indians emigrated from India since 2010. Chinese American, the second largest group behind Indian, accounts for 20% of Asians in Ohio. The Chinese community is growing quickly, increasing by approximately 25,000 people since 2000. Around two-thirds of this growth is due to international migration. The Ohio Vietnamese community, while smaller, is experiencing significant growth. Since 2000 it has grown by more than 50% to around 21,000 people. The Filipino and Korean populations are also growing, but at a slightly slower pace. The size of the Japanese community has not changed significantly since 2000. Roughly 75% of Asian American Ohioans speak a language other than English at home. How proficient they are at English depends, to some extent, on their or their family's country of origin. About 90% of the foreign-born Asian population in Ohio with ties to south central Asia, mainly India, speaks a language other than English at home. Of these, around two-thirds report speaking English "very well". About 50% of Asian Americans that speak Chinese, Korean, or Japanese at home report speaking English "very well." Less than 25% from these three groups reports speaking English at home.

Figure 5: Asian Ancestry in Ohio



Source: 2014-2018 American Community Survey

Household Characteristics

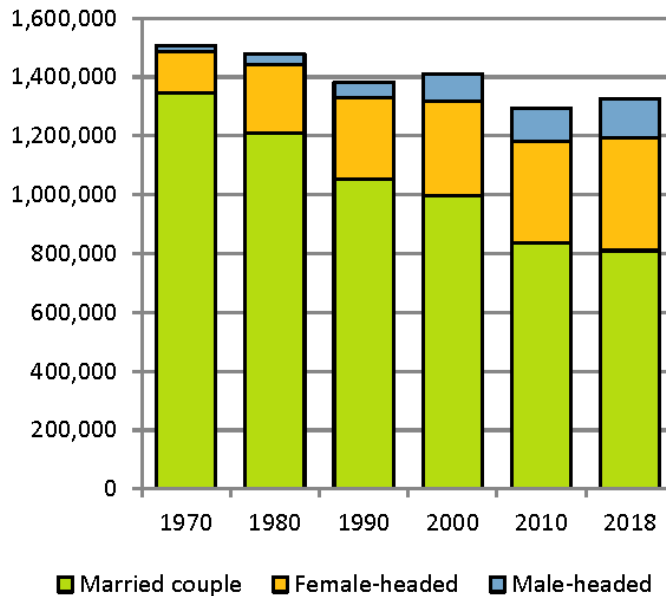
Familial status and disability are protected classes in federal fair housing laws. In Ohio, the average household size is 2.43 individuals, down from 3.43 in 1950. Of all households in the state, 31% consist of one individual living alone.

Nationally, 30% of families have children. Ohio households of families with children comprise 28% of total households. Married-couple families with children living at home comprise 26.8% of all families. There are nearly 3 million families in Ohio, of which 41.8% have children living at home younger than age 18. Of all married-couple families:

- 118,000 marriages include at least one African American spouse
 - 43% with children living at home
- nearly 51,000 marriages include at least one Hispanic spouse
 - 58% with children living at home
- nearly 54,000 marriages include at least one Asian American spouse
 - 60% with children living at home

Single-female and single-male households without a spouse that have children younger than 18 years living at home represent 11.3 and 3.7% of families, respectively. Of the total single-mother households, African American mothers comprise 62%; Hispanic-American mothers 34% and Asian-American mothers 8%.

Figure 6: Families with Children Under 18 in Ohio



Source: 2014-2018 5-Year American Community Survey for Ohio
U.S. Bureau of Census

Under both federal and state law, disability is a protected class. According to ACS data, 14%, 1.6 million individuals, identify as having some form of disability in the state. Ohio's Appalachian region has a slightly higher percentage of disabled individuals than the rest of the state at 16.8%. In Ohio's Appalachian region, 12 counties have a disability rate of 20% or more: Pike (24.1), Meigs (23.2), Lawrence (22.7), Scioto (22.3), Morgan (22.1), Vinton (21.6), Monroe (21.5), Gallia (20.8), Ross (20.6), Washington (20.4), Noble (20.3) and Adams (20.2)(Map 7). Ohioans 65 years and older comprise 34.6% of the state's disabled population, as illustrated in Table 5. Disabled older adults with ambulatory difficulty comprise 21.8% of the disabled older adult population. There are more than 433,500 individuals with a hearing impairment and more than 273,000 with a vision impairment living in Ohio.

For people with severe and persistent mental illness or substance use disorders, people with developmental disabilities, and older adults with cognitive and physical health limitations, access to stable, affordable housing is one of the main factors that allows these populations to remain living in the community, avoiding long-term institutional care. Housing for these disabled populations require a variety of support services.¹

Table 5: Age and Disability in Ohio		
Total Population with a Disability	1,601,403	14.0%
Under 5 Years Old		
	4,642	0.7%
<i>hearing difficulty</i>	2,884	0.4%
<i>vision difficulty</i>	2,475	0.4%
5-17 years old		
	126,960	6.6%
<i>hearing difficulty</i>	12,929	0.7%
<i>vision difficulty</i>	16,716	0.9%
18-64 years old		
	838,090	11.9%
<i>hearing difficulty</i>	156,938	2.2%
<i>vision difficulty</i>	142,326	2.0%
<i>cognitive difficulty</i>	376,578	5.4%
<i>ambulatory difficulty</i>	406,710	5.8%
<i>self-care difficulty</i>	142,826	2.0%
<i>independent living difficulty</i>	298,844	4.3%
65 years and older		
	631,711	34.6%
<i>hearing difficulty</i>	260,807	14.3%
<i>vision difficulty</i>	110,858	6.1%
<i>cognitive difficulty</i>	146,300	8.0%
<i>ambulatory difficulty</i>	396,958	21.8%
<i>self-care difficulty</i>	138,970	7.6%
<i>independent living difficulty</i>	255,512	14.0%

Source: 2018 5-Year American Community Survey for Ohio
U.S. Bureau of Census

Income, Poverty and Employment

Income

The 2018 per capita personal income for Ohio was \$48,242 (29th in the country). This was an increase of 3.3% (38th in the country) from the previous year according to the U.S. Bureau of Economic Analysis. Since 1969, per capita personal income has had

¹ Ohio Governor’s Office of Health Transformation

annual increases as high as 10.7% which occurred during the 1970's and as low as -3.0% in 2009.

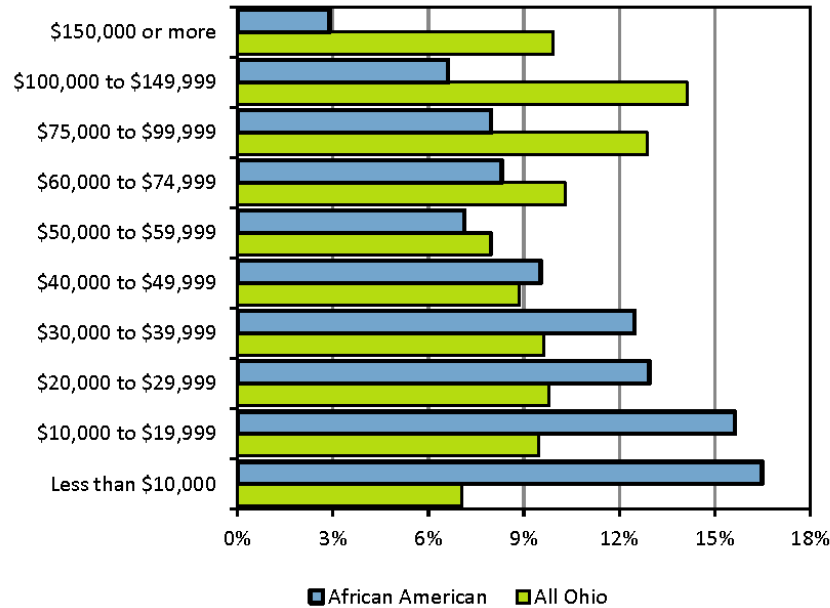
Figure 7: Per Capita Personal Income; Selected Years

	1970	1980	1990	2000	2010	2014	2015	2016	2017	2018
U.S.	\$4,198	\$10,180	\$19,621	\$30,657	\$40,546	\$47,060	\$48,985	\$49,883	\$51,731	\$53,712
Ohio	\$4,137	\$9,924	\$18,683	\$28,684	\$36,663	\$42,792	\$44,406	\$45,127	\$46,710	\$48,242

Source: 2014-2018 American Community Survey

The income of African American Ohioans tends to be lower than that of Ohioans taken as a whole, with the median household income approximately \$33,500. A lack of full-time, year-round employment is one factor accounting for the lower income.

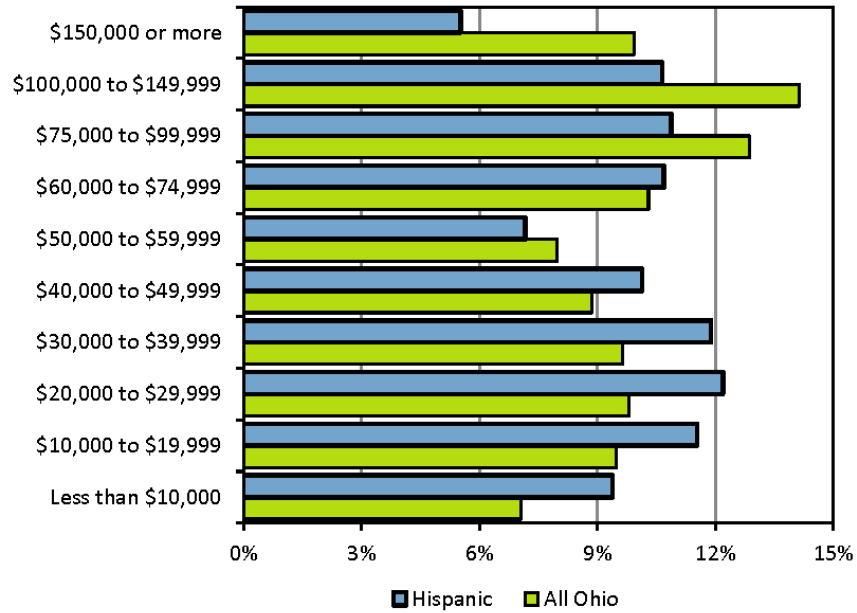
Figure 8: African American Household Income Distribution in Ohio



Source: 2014-2018 American Community Survey

As a whole, the median income of Hispanic Ohioans is lower than the state median income. The median household income for Hispanics is slightly more than \$44,000. This figure is influenced by the latest immigrants to Ohio. The median household income for immigrants from Mexico is \$43,000, with the median household income for immigrants from other Central American countries significantly lower at \$36,000.

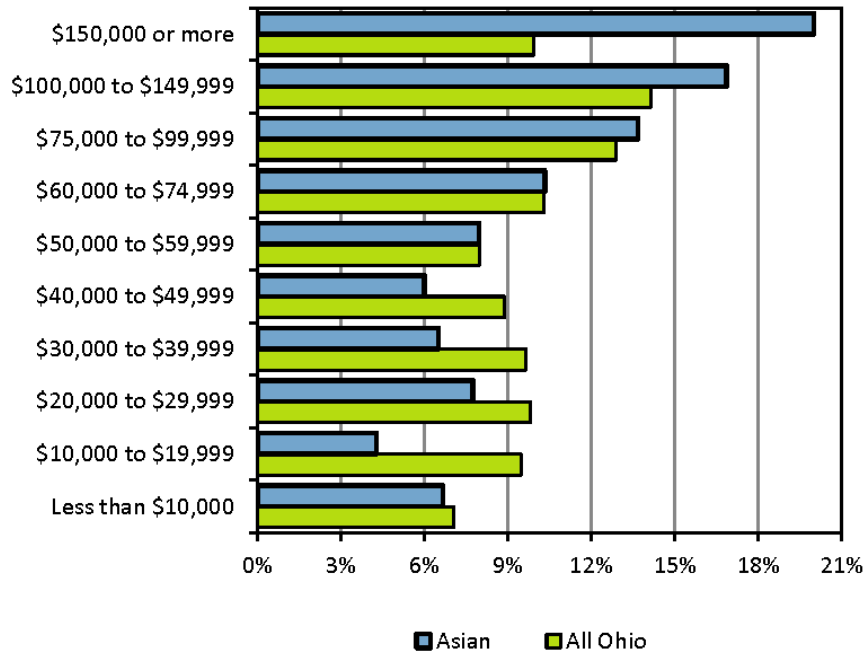
Figure 9: Hispanic Household Income Distribution in Ohio



Source: 2014-2018 American Community Survey

The income of Asian Americans in the state tends to be higher than that of Ohioans taken as a whole. The median household income for Asian Americans living in Ohio is more than \$75,822. The income of foreign-born persons from Asia was slightly lower than that of Ohio's Asian population taken as a whole.

Figure 10: Asian Household Income Distribution in Ohio



Source: 2014-2018 American Community Survey

Poverty

Since 2005, Ohio's poverty rates have been nearly equal to or slightly higher than national averages except for the 2008-2010 period when Ohio's family poverty rate appeared slightly greater than the national rate. The latest data shows that an estimated 1.6 million people in Ohio were poor, 14.0% of all persons for whom poverty status was determined. Nearly 290,000, or 9.8%, of Ohio families were poor in 2018 (Appendix 4).

In Ohio, 16.2% of the people in urban places (densely populated areas of 2,500 or more) were poor, and 26.3% of those living in the central or principal cities of metropolitan areas were poor in 2017. By contrast, 10.3% of those in rural areas (farms and smaller places) were poor, while 10.3% of metropolitan area residents outside of the principal and central cities were poor. In Ohio's Appalachian region, 17.2% of the population was poor; the poverty rate for the rest of Ohio averaged 14.4% (Appendix 5).

The counties with the lowest poverty rates were Delaware, Warren, Medina and Geauga, ranging from 5.1 to 6.5%. All five counties border or are part of metropolitan areas. The counties with the highest poverty rates were all in Appalachia: Athens, Scioto, Adams and Meigs and ranged from 30.2 to 22.5% (Map 8).

Poverty rates for families and individuals in Ohio during 2016-2017 varied by circumstances and characteristics. Married couples with a full-time, year-round worker had poverty rates of 4% or less (under 2.0 if the other worked) compared with poverty rates of 9% or more among couples lacking a full-time, year-round worker. Other families with a full-time, year-round head had poverty rates between 4 and 12%, while those without a full-time, year-round worker had poverty rates greater than 29%.

Families with related children had poverty rates ranging from 5.7% among married couples to 39.7% for those headed by a female single-parent. The corresponding poverty rates for families without children ranged from 2.9% to 10.4%, the same as male single-parent families. Slightly more than 24.7% of poor families received cash public assistance, compared with just 6.3% of those not in poverty; however, such payments seldom boost families out of poverty. Adults with at least a bachelor's degree account for 3.8% of Ohio's poor population, while 27.3% of those who did not graduate from high school were poor. High school graduates and those with some college or an associate's degree had poverty rates between 13.4 and 10%.

By age, children birth to age 11 and young adults 18 to 24 had poverty rates that exceeded 20%. Conversely, about 7.6% of people ages 65 and older were poor, but between 43 and 62% of that population would have been poor without Social Security and pension incomes.

Minorities tend to have higher rates of poverty compared to whites. Twenty-nine percent of African Americans in Ohio live below the poverty line. Of Ohio's 318,000 African American family households, 24% live below the poverty line. Around 44% of these households have children younger than 5 years of age. Twenty-seven percent of African American households received food stamps within the last 12 months. Twenty-four percent of Hispanic Ohioans live below the poverty line. Of Ohio's 89,000 Hispanic family households, 20% live in poverty, of which 44% have children younger than 5 years of age. Nineteen percent of Hispanic households received food stamps within the last 12 months. Of Ohio's Asian American population, 12% live below the poverty line. Of Ohio's nearly 62,000 Asian American family households, 7% are in poverty, and around three-fourths have related children at home. Approximately 7% of Asian Americans households received food stamps within the last 12 months.

Employment

Ohio's manufacturing sector employs 686,465 people. The state's factories lead the nation in plastics and rubber, fabricated metals, and electrical equipment and appliance production. Ohio also is a leading producer of steel, autos, and trucks. Skilled manufacturing workforce, healthcare hubs, relatively low business costs, and increasing diversification in the metropolitan areas are areas of economic strength.

The state's private sector is comprised of 763,418 self-employed firms and 181,379 employer firms. Small businesses employing one or more workers account for 20% of all firms and employ 48% of the workforce. Self-employed or non-employer firms comprise 78% of all businesses. Table 6 lists the state's major employers. A full list can be found in Appendix 6.

Table 6: Major Employers in Ohio		
Company	Employment Estimate	Sector
Cleveland Clinic Foundation	50,825	Health
Wal-Mart Stores, Inc.	49,330	Retail: General Merchandise
Kroger Co.	45,340	Retail: Food Stores
Ohio State University and Medical Center	34,470	Education and Health
Bon Secours Mercy Health, Inc.	31,500	Health
University Hospitals Health System, Inc.	28,000	Health
Wright-Patterson Air Force Base	28,000	Government: Air Force base
OhioHealth	26,600	Health
ProMedica Health System	22,500	Health
JPMorgan Chase & Co.	21,000	Finance: Bank
Giant Eagle, Inc.	19,000	Retail: Food Stores
Cincinnati Children's Hospital Medical Center	15,660	Health
Honda Motor Co., Ltd.	15,000	Manufacture: Motor Vehicles

Source: Ohio Development Services Agency

There are more than 81,000 African American-owned businesses in Ohio. Of that number, there are more than 3,300 businesses with a payroll and, combined, employ nearly 44,000 workers with an annual payroll of more than \$1.2 billion. Hispanic Americans own more than 16,000 businesses in Ohio, of which there are 1,553 Hispanic businesses with a payroll and, combined, employ more than 23,600 workers with an annual payroll of more than \$528 million. Asian Americans own more than 21,000 businesses in Ohio. Of that number, businesses with a payroll total more than 7,000 and, combined, employ more than 64,000 workers with an annual payroll of nearly \$1.8 billion.

Ohio's civilian labor force totaled more than 5.7 million in 2018, with more than 5.4 million individuals employed. The national unemployment rate for December 2019 was 3.5%. Ohio's unemployment rate was 4.2% in December 2019 compared to 5% a year earlier. Total

employment in Ohio is expected to increase 4.4% from 2016 to 2026, a projected gain of 253,300 jobs (Map 9).

The number of African American Ohioans in the civilian labor force is more than 694,000; the unemployment rate for African American Ohioans is 9.5%. African Americans in the labor force between the ages of 16 and 24 have an unemployment rate of 13.2%. For Ohio, as a whole, the same age group has a 7.9% unemployment rate. Employed African Americans are heavily represented in service and sales/office occupations. Of the more than 628,000 employed African Americans in Ohio, 26% are in service occupations with 52,000 in healthcare support. By comparison, 17% of all Ohioans are in service occupations.

Production/transportation/material moving occupations account for 23% with 62,000 African American Ohioans involved in production occupations alone.

The number of Hispanic Ohioans in the civilian labor force is nearly 212,000. Hispanic Ohioans have an unemployment rate of 7.3%. Hispanics make up 5.6% of the labor force between the ages of 20 and 24. This coincides with the age distribution of Ohio Hispanics and the concentration of young adults.

Employed Hispanics are heavily represented proportionally in the service occupations, especially in food preparation and serving occupations, compared to the state. Of the 196,000 employed, nearly 19,000, or 9.5%, are in food occupations. For all Ohio workers, only 5.9% are in food occupations. Production occupations and cleaning and construction occupations also have higher concentrations of Hispanic workers compared to the whole workforce.

Based on 2018 American Community Survey data, the number of Asian American Ohioans in the civilian labor force is greater than 147,000 and accounts for 2.5% of the civilian labor force. Asian Americans in Ohio have an unemployment rate of 4.8%; Ohioans as a whole have an unemployment rate of 2.5%. Employed Asian Americans are highly represented in professional occupations, compared to Ohioans as a whole. Of the roughly 143,000 employed Asian Americans, nearly 46% are in occupations of computer/engineering/science (20%), management (16%), and healthcare (10%). There is also a significant number in education occupations.

Housing in Ohio

Ohio has more than 5.1 million total housing units, with a 10.5% vacancy rate. In the Appalachian region, the vacancy rate is 12.5%. More than 3 million individuals, 66.1%, in the state own their own home and more than 1.5 million, 33.9%, rent housing. Nearly 71.3% of the population owns their own home in Ohio's Appalachian region, while 28.7% rent housing.

According to HUD, the median year homes were built in the nation was 1977. The median year housing units were built in Ohio is 1967 and 1969 in the Appalachian region, 10 and 8 years before the national median year, respectively. Most of Ohio's homes, roughly 66%, were built by 1979 (Table 7). Due to age, maintaining older housing can cause financial strain on the homeowner. Homes built after 1979 comprise 32.6% of the state's housing stock.

Year Built	Estimate	Percentage
2010 or later	124,259	2.4%
2000-2009	501,604	9.7%
1990-1999	614,813	11.9%
1980-1989	466,027	9.0%
1970-1979	741,153	14.3%
1960-1969	632,105	12.2%
1950-1959	732,973	14.1%
1940-1949	324,252	6.2%
1939 or earlier	1,051,084	20.3%

Source: 2014-2018 American Community Survey

The median gross rent per month in Ohio is \$764 and \$662 in the Appalachian region. Table 8 illustrates the median gross rent for housing units in the state. Renters in the state on average allocate 28.6% of their household income to housing.

<i>Amount</i>	<i>Number</i>	<i>Percent</i>
Less than \$100	12,425	0.78%
\$100 to \$199	18,339	1.16%
\$200 to \$299	57,739	3.65%
\$300 to \$399	46,842	2.96%
\$400 to \$499	81,937	5.18%
\$500 to \$599	150,980	9.54%
\$600 to \$699	198,449	12.54%
\$700 to \$799	208,095	13.15%
\$800 to \$899	183,773	11.61%
\$900 to \$999	152,349	9.62%
\$1,000 to \$1,249	224,131	14.16%
\$1,250 to \$1,499	87,941	5.56%
\$1,500 to \$1,999	54,685	3.45%
\$2,000 to \$2,499	14,284	0.90%
\$2,500 to \$2,999	4,607	0.29%
\$3,000 to \$3,499	2,772	0.18%
\$3,500 or more	2,568	0.16%
No cash rent	80,932	5.11%

Source: 2014-2018 American Community Survey

The National Low-Income Housing Coalition's (NLIHC) *Out of Reach 2019* report states that a household would need an annual income of \$32,728 to afford a two-bedroom unit at Ohio's

average fair market rent (FMR) of \$818. For non-metropolitan areas, FMR for a two-bedroom unit averages \$704. An individual making minimum wage would have to work 74 hours per week to rent a two-bedroom unit at FMR.

Out of Ohio's 88 counties, 41 have FMR that exceeds \$704 a month for a two-bedroom unit, with 17 exceeding \$818 per month. Below are the 47 counties with average FMR of \$704 or lower per month for a two-bedroom unit.

Adams	Champaign	Defiance	Highland	Knox	Muskingum	Richland	Van Wert
Allen	Clinton	Gallia	Hocking	Mahoning	Noble	Sandusky	Vinton
Ashland	Columbiana	Guernsey	Holmes	Meigs	Paulding	Scioto	Washington
Ashtabula	Coshocton	Hardin	Huron	Mercer	Pike	Seneca	Williams
Auglaize	Crawford	Harrison	Jackson	Monroe	Preble	Shelby	Wyandot
Belmont	Darke	Henry	Jefferson	Morgan	Putnam	Trumbull	

The median home value in Ohio is \$135,100 compared to the national median value of \$204,900. The median monthly homeowners' cost in the state is \$1,247. The monthly costs calculation includes mortgage, real estate taxes, various insurances, utilities, fuels, mobile home costs, and condominium fees. On average, owners' costs comprise 19.9% of a household's monthly income.

Households without a mortgage generally pay a lower percentage of their household income toward housing. Overall, 76.1% of households without a mortgage spend less than 20% of their monthly income for housing. However, 52.1% of the state's households with a mortgage spend less than 20% of their monthly income for housing.

Property taxes can also deter individuals from owning a home or preventing foreclosure. The Ohio Department of Taxation's homestead exemption allows low-income older adults and permanently and totally disabled individuals to reduce their tax bills by shielding some of the market value of their homes from taxation. The exemption allows qualifying homeowners to exempt up to \$25,000 of the market value (\$8,750 in taxable value) of their homes from all local property taxes in the form of a credit on property tax bills. Veterans who have received a 100% permanent total disability rating or a total disability rating for a service-connected disability or combination of service-connected disabilities are exempt from this income threshold and are eligible to receive a homestead credit value of \$50,000. Any Ohio resident homeowner may qualify for the exemption if they meet the following criteria:

- Not currently receiving homestead or did not qualify in the previous tax year;
- Qualifies under the means-test;
- Is at least 65 years of age or turns 65 in the year applying for the exemption;
- Is determined permanently and totally disabled as of January 1 of the application year by a licensed physician or psychologist or a state or federal agency; or
- Is the surviving spouse of a person who received the previous homestead exemption at the time of death and the surviving spouse was at least 59 years old on the date of the death.

Section 2: Federal and State Fair Housing Laws

Ohio Civil Rights and Fair Housing History²

Early in Ohio's history, settlements in southern Ohio by people from slave states progressed faster than northern Ohio by settlers from eastern states. As a result, this set the initial tone for civil rights toward the largest minority group of the time: free Africans and escaped and free slaves. Most freed and escaped slaves settled in Ohio River and southern counties where attitudes toward these groups were not of equality. During this time, the Ohio legislature passed a series of "Black Laws" that imposed constraints on free African Americans to discourage them from settling in the state. Enacted in 1804 and 1807, these laws treated African Americans as second-class citizens. More stringent restrictions were enacted in the 1830s; however, most of these restrictions were repealed by 1850.

The Civil War created an intense period of industrialization and population growth. While a significant number of African Americans lived in Cincinnati, Columbus and other towns, most of the industrial labor force was comprised of whites migrating from Ohio's rural areas and immigrants. The post-war period brought with it greater diversity in ethnic and religious groups. Large numbers of Italians, Slovenians, Croatians, Polish, Lithuanians, Slovaks and Jewish and Eastern Orthodox religious followers came to Ohio. Southern and eastern Europeans settled mainly in Cleveland and the Mahoning Valley. Toledo included these groups along with Mesopotamian Chaldeans from Detroit. At this time, few Asians or Hispanics immigrated to Ohio. Although these groups were no more qualified for industrial work than African Americans, employers preferred to recruit immigrants.

European immigrants initially tended to concentrate in certain neighborhoods, particularly those with the least expensive housing, close to commerce or in areas where they could organize an ethnic religious parish. In Cincinnati, the Over the Rhine district was a center of German settlement and culture. In Cleveland, many Italian and Jewish immigrants settled in the Central district southeast of the main market. Despite these patterns, it was unusual for one white ethnic group to comprise more than 50% of a neighborhood. In Cleveland, African Americans lived in the Central district and in other neighborhoods throughout the city. Prior to World War I, housing patterns were more racially diverse in Ohio than they were following the Great Migration and Ohio's housing industry's and communities' response to the Great Migration.

Coinciding with World War I, several factors affected change in race relations in Ohio. Woodrow Wilson, a southerner, was elected president and effectively stopped race relations at the federal level. The beginning of the war cut off immigrant labor to America at the same time demand for American products increased. Employers were forced to look at domestic labor to fill wartime needs. As a result of boll weevils ravaging southern cotton crops and an oppressive system in the south, many African Americans were receptive to recruiters. Nearly 6 million African Americans from southern states migrated north during the Great Migration from about 1916 to 1970. From 1910 to 1920, Cleveland's African American population quadrupled. By 1930, the population doubled again and comprised 8% of the city's population. By 1960, more than 250,000 African Americans lived in Cleveland.

²Ohio State Legal Services Association. *History of Fair Housing in Ohio*. Ohio Development Services Agency, 1999. Web. May 4, 2015.

As more African Americans migrated to Ohio, white citizens and community, social and economic institutions responded to the racial change. Economic, social and governmental institutions' racial policies and practices had more lasting and widespread consequences on civil rights, especially housing rights in Ohio. Institutionalized racial discrimination patterns, enforced by government regulation or professional associations, replaced looser, more sporadic instances of social bias in the state.

In housing, real estate companies encouraged restrictive covenants to restrict certain groups from purchasing property in many areas. Developers of an exclusive suburb in Cleveland specified no African Americans would reside in the suburb, even those professionals who could afford to live there. In another suburb, a neighborhood associated developed a restrictive covenant excluding Jews and many southern and eastern European ethnic groups. As more European ethnic groups became "Americanized", the real estate market welcomed their money; however, this did not extend to African Americans. The U.S. Supreme Court ruled restrictive covenants legally unenforceable in 1948. Despite the decision, many sellers and agents continued to follow these practices.

The federal government explicitly supported racial exclusion in its Federal Housing Administration (FHA) and Veterans' Administration (VA) mortgage loan insurance programs initially. The FHA manual mentioned the need to avoid introducing "inharmonious" racial groups into all-white neighborhoods. Public housing projects built during the Great Depression were originally racially segregated by policy, with separate projects for African Americans and whites. After World War II, when the federal government subsidized white migration to the suburbs by providing low-interest home loans and constructing superhighways, African Americans were relegated to older inner-city housing vacated by whites.

With exclusion from most neighborhoods by institutional design or individual hostility and violence, African Americans lived in neighborhoods open to them. As families doubled up or larger homes were divided into substandard efficiency apartments, population densities increased in these neighborhoods. With high demand and limited supply, rents or housing prices in these densely populated areas were higher than in nearby white areas. As a result, some real estate agents engaged in block-busting for economic reasons. These agents would target white neighborhoods adjacent to predominantly African American ones. Agents would help one African American family move into the neighborhood, then market to neighboring whites offering to buy their properties at less than the home's value. Agents would make a profit twice: selling a new home in a suburb to white homeowners and then selling the vacated home to an African American family at a considerable markup. Lending institutions and insurers typically supported these practices by refusing loans to African Americans except in predominantly African American neighborhoods or in "changing" neighborhoods. Conversely, white buyers were typically directed away from these areas by realty companies and lenders.

Federal efforts in the late 1940s resulted in the Housing Act of 1949 that called for decent and safe housing for all Americans. The Act authorized the federal government to award funds to communities to assist in eliminating slum and redeveloping center cities, new construction, and activities that support new construction such as neighborhood facilities, and basic water and sewer facilities. The federal government provided subsidies totaling nearly \$13 billion to communities that were then required to supply matching funds. Local governments obtained sites through eminent domain, the right of the government to take over privately owned real estate for public purposes, in exchange for "just compensation". They would then sell the cleared land to private real estate developers at below-market prices. In return for the subsidy and certain tax abatements, developers built commercial projects and housing for the upper-

middle class. The act also promoted building civic centers, office buildings, and hotels on the cleared land. In many areas, land too close to slum areas became municipal parking lots.

The Highway Act of 1956 funded interstate highways that also helped perpetuate urban sprawl. White middle-class residents moved to new suburban housing developments. The highways also divided cities physically. Clearing inner-city neighborhoods to construct the new highway system destroyed neighborhoods and displaced low-income residents. Nationally, more than 2,000 construction projects on 1,000 square miles of urban land were undertaken between 1949 and 1973, when the urban renewal program officially ended. Roughly 600,000 housing units were demolished, requiring nearly two million inhabitants to move.³

During this time, politically, African Americans were represented on city councils and school boards and a few were members of the Ohio General Assembly and judiciary system. However, there were no African American mayors of medium- to large-sized cities, statewide elected officials or Congress members. While the African American population grew, as a group, they still had limited political representation.

In 1959, the Ohio General Assembly passed legislation prohibiting employment discrimination and established the Ohio Civil Rights Commission. While the law created the Commission to enforce discrimination laws, the Commission did not always have funding. In 1965, the Ohio General Assembly passed legislation that extended discrimination protection to housing, and in 1987, passed Ohio's Fair Housing Law.

In August 1988, Congress amended the federal Fair Housing Law to substantially increase HUD's power to seek relief for individual housing discrimination claims. Other amendments broadened the number of protected classes to include families with children and the disabled. In 1989, the federal government grandfathered the Ohio law into substantial equivalency. Ohio's substantially equivalent fair housing law was passed in June 1992.

Although Ohio's legislature passed fair housing laws, voters during the 1970s and 1980s continued to reject amending the Ohio Constitution to permit issuing mortgage revenue bonds for housing. When multi-family housing was removed from the language, voters passed the amendment in 1982. The Ohio Housing Finance Agency was created in 1993. With active participation by fair housing agencies across the state, the Ohio Housing Finance Agency adopted fair housing policies.

In 1980, HUD released a study concluding that 25% of all rental housing in the nation was not available to families and an additional 50% of the rental stock imposed significant restrictions on either the age or number of children in a family. Families with children lacked fair access to 75% of the nation's rental housing. As a result, families were evicted from their homes because of size. Until the federal Fair Housing Amendments Act of 1988 (FHAA) was enacted, both federal and Ohio fair housing laws primarily protected racial and ethnic minorities against housing discrimination. The FHAA was enacted with two purposes: to strengthen the administrative enforcement provisions of Title VIII and extend Title VIII protections to additional individuals by including familial status and disability.

Congress' general intent for the Fair Housing Act and the 1988 amendments was to ensure all Americans have equal access to adequate housing and an equal opportunity to obtain housing

³Curtis, Cathy. "Urban Redevelopment." *Dictionary of American History*. Ed. Stanley I. Kutler. 3rd ed. Vol. 8. New York: Charles Scribner's Sons, 2003. 285-288. *Gale Virtual Reference Library*. Web. 4 May 2015.

they choose. Since relatively few minorities live in rural Ohio, prior fair housing laws did not impact those areas as much. By amending the Fair Housing Act to prohibit familial status and disability discrimination, Congress expanded the fair housing law's scope and made the law more relevant to individuals living in Ohio's rural areas. Both issues in fair housing may be more pervasive in rural areas because of smaller housing supply, greater geographic distances and related mobility barriers, no or limited access to local fair housing agencies or civil rights organizations and a larger proportion of small, private owners in rural housing markets. Many low-income families with children in rural areas live in mobile home parks, which have not been enforced as aggressively as other housing types. Since the Fair Housing Act of 1988 and Ohio's substantially equivalent legislation passed in 1992, housing discrimination charges based on familial status or disability rose considerably.

Ohio, like the nation, has a serious affordable housing shortage, which is exacerbated by housing discrimination against families with children. In 1998, the Coalition on Homelessness and Housing in Ohio released a study entitled "Out of Reach: Rental Housing at What Cost?" that analyzed the issues renters faced in the private rental market in Ohio. The study found:

- 37% of all Ohio renters were unable to afford rent for a two-bedroom unit (30% of income for housing costs);
- Low-income renters paid more than one-third of their household income for housing costs in all of Ohio's metropolitan areas;
- In the 39 counties analyzed, low-income renters had to pay more than one-third of their household income for a two-bedroom unit;
- In all of Ohio's metropolitan areas and the 39 counties analyzed, renters earning minimum wage had to work between 60 and 81 hours per week to afford a two-bedroom unit; and
- In rural areas low-income renters could not afford fair market rent for a two-bedroom unit.

The Fair Housing Amendment Act had three broad purposes related to individuals with disabilities:

- To end segregated housing available to individuals with disabilities;
- To expand housing choice for individuals with disabilities; and
- To assure reasonable accommodations are made to the individual needs of people with disabilities in securing and using housing.

The disabled provisions of the FHAA provided broad protections for individuals with disabilities. However, three unique discrimination categories were included for individuals with disabilities:

- Refusing to rent or sell to individuals with disabilities or attempting to evict an individual because of a disability;
- Landlord or housing provider refuses an individual's request for a reasonable accommodation in rules, policies, practices or services to enable an individual to acquire or enjoy a unit; and
- Landlord's or housing provider's failure to make certain units of newly constructed multi-family housing accessible to disabled individuals with mobility impairments.

The Ohio Civil Rights Commission experienced a large increase in the numbers of fair housing and disabled discrimination claims filed in 1999. The Commission refocused its energies, and

along with HUD, expanded community education and outreach efforts. The Ohio Development Services Agency and fair housing organizations in the state increased educational efforts on fair housing and served as clearinghouses for disseminating information to civil rights and housing advocates across Ohio. Many small cities in Ohio have established local fair housing agencies, appointed a local fair housing contact and passed local fair housing ordinances. In several rural counties, local legal aid programs received funding to perform fair housing education and outreach and investigate cases. Professional associations related to housing also conduct national, state and local fair housing trainings for their members.

Current Federal Laws and Executive Orders

Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

Title VI of the Civil Rights Act of 1964

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973

Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974

Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program.

Title II of the Americans with Disabilities Act of 1990 and the Olmstead Decision

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals. The Olmstead decision put forth federal requirements on how agencies that receive federal assistance should encourage integrated housing opportunities for those with disabilities to ensure housing choice, reinforcing self-determination.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972

Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Executive Order 11063 (1962)

Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246 (1965)

Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892 (1994)

Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898 (1994)

Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166 (2000)

Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217 (2001)

Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

In addition to federal fair housing laws that apply to all transactions, including lending and insurance, the following federal laws specifically address lending practices s:

- *The Equal Credit Opportunities Act* – 15 U.S.C.A. Section 1691 et seq.- prohibits creditors from discriminating against credit applicants on the basis of race, color, religion, national origin, sex, marital status, age, because an applicant receives income from a public assistance program, or because an applicant has in good faith exercised any right under the Consumer Credit Protection Act.
- *The Home Mortgage Disclosure Act* – 12 U.S.C. Section 29011 et seq.
- *The Community Reinvestment Act* – 12 U.S.C. Section 2901 et seq.

Current State Laws

The Ohio Fair Housing Law [O.R.C. 4112.02(H)] gives all persons in the federally protected classes the right to live wherever they can afford to buy a home or rent an apartment. The Ohio law also adds two additional protected classes: ancestry and military status (Appendix 8).

According to Ohio law, it is unlawful, on the basis of race, color, religion, sex, national origin, ancestry, military status, disability, or familial status to:

- Refuse to rent, sell, finance, or insure housing accommodations or residential property
- Represent to any person that housing accommodations are not available for inspection, sale, rental, or lease
- Refuse to lend money for the purchase, construction, repair, rehabilitation, or maintenance of housing accommodations or rental property
- Discriminate against any person in the purchase, renewal, or terms and conditions of fire, extended coverage, of homeowners or renter's insurance
- Refuse to consider without prejudice the combined income of both spouses
- Print, publish, or circulate any statement or advertisement which would indicate a preference or limitation
- Deny any person membership in any multiple listing services or real estate broker's organization

Section 3: Ohio Development Services Agency Community Development Programs

The State of Ohio, through the Ohio Development Services Agency's Office of Community Development (OCD), administers Ohio's Community Development Block Grant (CDBG), HOME Investment Partnerships, Emergency Solutions Grant and Housing Opportunities for Persons With AIDS program funds received from HUD for non-entitlement communities. OCD distributes these federal funds and state funds, based on both an allocation basis and competitive process, to eligible local governments and nonprofit agencies. These funds help Ohio's communities prepare for growth and job creation by providing funding for community development, infrastructure improvements and economic development. OCD administers the following programs:

- Appalachian Regional Commission Program: support economic development, job creation or community development within the 32-county Appalachian region
- Economic Development and Public Infrastructure Program: provide grants to improve infrastructure and loans for fixed asset financing for land, building, machinery and site preparation directly and primarily related to creating, expanding or retaining a business in the community
- Community Development Programs
 - *Allocation Program*: improve public facilities, public services, housing, economic development and fair housing
 - *Downtown Revitalization*: improve Central Business Districts, aid in eliminating slums or blighted structures, and create and retain permanent, private-sector job opportunities for low- and moderate-income individuals
 - *Neighborhood Revitalization*: improve the quality of life, livability and functionality of distressed areas and neighborhoods through public infrastructure projects
 - *Critical Infrastructure*: fund public infrastructure improvements with a significant community impact
- Residential Public Infrastructure Grant Program: create safe and reliable drinking water and ensure communities' sanitary waste is properly disposed
- Community Housing Impact and Preservation Program: flexible, community-wide approach to improve and provide housing for low- and moderate-income individuals
- Housing Opportunities for People with AIDS: provide housing and supportive services to low- and moderate-income persons with AIDS or HIV-related diseases
- Housing Assistance Grant Program: promotes affordable housing opportunities and improves housing conditions through emergency home repair for individuals at or below 50% of Area Median Income and provides limited down payment assistance
- Homeless Crisis Response Program: provide homeless prevention services and emergency shelters and housing resources to nonprofit organizations, local governments and public housing authorities that serve the housing needs of homeless people and people facing homelessness

- Supportive Housing Program: reduce homelessness in Ohio and provide funding for transitional and permanent supportive housing to nonprofit organizations, local governments, and public housing authorities that provide transitional housing to homeless families and permanent supportive housing for homeless disabled persons

Section 4: State of Ohio Fair Housing Requirements and Initiatives

Title I of the Housing and Community Development Act of 1974, as amended, requires each unit of general local government that receives Community Development Block Grant (CDBG) funding from a state to certify that it will affirmatively further fair housing (see also 24 Code of Federal Regulations (CFR) 570.487(b)). To ensure that state-funded non-entitlement jurisdictions take actions that promote fair housing choice at the local level, OCD developed a mandatory Standard Fair Housing Program that incorporates training, outreach, technical assistance, and a locally developed Analysis of Impediments (Appendix 9). As a condition of funding, each local government grant recipient must develop and implement a Standard Fair Housing Program. OCD provides training and technical assistance throughout the grant cycle and evaluates the implementation of the Standard Fair Housing Program during compliance monitoring.

State of Ohio Standard Fair Housing Program

The Standard Fair Housing Program is a community-based framework of analysis, outreach, training and technical assistance that serves to affirmatively further the purposes of the Fair Housing Act. Through this program, local governments actively promote fair housing by appointing a local contact, analyzing impediments to fair housing choice and providing targeted public education.

Local Fair Housing Contact

Each local government CDBG grantee is required to identify a local fair housing contact. The local fair housing contact is a local government employee who provides general information, receives and processes fair housing complaints and refers cases to the Ohio Civil Rights Commission. Local governments may also retain a consultant or local agency to assist with complaint processing and implementing the Standard Fair Housing Program. OCD maintains and publishes a list of local fair housing contacts and associated consultants and local agencies to promote collaboration. The 2020 Fair Housing Contacts (November 2019) list is available on the Office of Community Development Technical Assistance website [here](#).

Education

The Standard Fair Housing Program provides essential education regarding discrimination and fair housing rights. Local governments design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations or civic groups.

Outreach

To reach a broad community audience, local governments also develop an annual plan to distribute fair housing brochures, pamphlets, posters and other informational materials to 10 area agencies, organizations, or public events.

Analysis of Impediments to Fair Housing

To help target education and outreach efforts, local governments must conduct a comprehensive analysis to identify impediments to fair housing choice within their jurisdiction.

The analysis should identify policies, actions, omissions, or decisions that restrict housing choices on the basis of the seven protected classes listed in the Fair Housing Act: race, color, religion, sex, disability, familial status, and national origin. Ohio's Fair Housing Act (Ohio Revised Code 4112) expands the list of protected classes to include ancestry and military status. Local governments use the Analysis of Impediments to Fair Housing to develop strategies to address and overcome discriminatory policies and practices. Each non-entitlement county and its local municipalities are covered by an Analysis of Impediments to Fair Housing.

New Horizons Fair Housing Assistance Program

Ohio encourages non-entitlement jurisdictions to undertake focused actions – beyond the required Standard Fair Housing Program – to promote fair housing choice and eliminate discriminatory housing practices. OCD's New Horizons Fair Housing Assistance Program provides discretionary funds to units of local government, or consortia of units of local government, to implement innovative training, outreach, and planning activities that serve to affirmatively further fair housing. New Horizons fair housing strategies are based on locally assessed needs and further the state's fair housing goals. Eligible jurisdictions include direct Community Development Program Allocation cities and counties. OCD allocates up to \$50,000 annually to the New Horizons Fair Housing Assistance Program

Monitoring for Compliance and Provision of Training & Technical Assistance

OCD monitors all grants funded with federal dollars for compliance with fair housing requirements. OCD provides training on the state's Standard Fair Housing Program during program application trainings for both the Community Development and Community Housing Improvement and Preservation Programs. OCD staff provides training and technical assistance to address noted issues when fair housing deficiencies are identified. Depending on the frequency and/or severity of the compliance violation, OCD is empowered to pursue progressive corrective actions up to and including canceling a grant, recapturing funds, and de-certifying the grantee as an eligible CDBG recipient.

Section 5: Fair Housing Complaint Data and the Fair Housing Assistance (FHAP) and Fair Housing Initiatives (FHIP) Programs

HUD shares its authority to investigate housing discrimination complaints with state and local government agencies that are certified through its Fair Housing Assistance Program (FHAP). FHAP agencies enforce state and local laws that provide rights, resolutions, procedures, and opportunities for judicial review that are substantially equivalent to those provided in the federal Fair Housing Act. In Ohio, the Ohio Civil Rights Commission (OCRC) is the statewide FHAP agency, with regional offices in Akron, Cincinnati, Cleveland, Columbus, Dayton and Toledo. Four additional FHAP organizations serve specific localities: the City of Canton Fair Housing Commission, the Dayton Human Relations Council, the City of North Olmstead, and the Shaker Heights Fair Housing Review Board.

This section presents statewide discrimination complaints filed with HUD's Office of Fair Housing and Equal Opportunity (FHEO) and FHAP agencies between January 1, 2015 and December 31, 2019 (Appendices 10-14). This section also provides an overview of HUD's Fair Housing Initiatives Program (FHIP), and the currently funded FHIP organizations in Ohio, many of whom serve on HUD's Fair Housing Advisory Board Committee.

The OCRC compiles information on all complaints related to housing discrimination in Ohio. These include complaints that are investigated by HUD as well as those investigated by FHAP partners. Individuals who believe they experienced discrimination in their search for a home, based on their color, race, national origin, sex, religion, disability, or familial status, have one year to file a complaint with HUD. Information collected on these complaints includes the local jurisdiction of the complaint, basis (there may be multiple bases), type of complaint, and complaint outcome.

Residents also may register housing discrimination complaints at private fair housing organizations. HUD provides funding to these organizations under the Fair Housing Initiatives Program (FHIP) to conduct intake, investigation, mediation, and litigation of housing discrimination complaints. However, these organizations do not provide full services statewide.

Basis of Federal Housing Discrimination Complaints

An individual filing a complaint indicates the basis for the alleged discrimination. Complaints to HUD indicate one of the seven protected classes — race, color, religion, national origin, sex, disability, and familial status, as described in the Fair Housing Act. In addition, a complaint may indicate the allegation of retaliation. In Ohio, a complainant may also file on the basis of military status or ancestry. An individual complaint can indicate multiple bases.

Between January 1, 2015 and December 31, 2019, 19.7% of the complaints in Ohio were filed in non-entitlement jurisdictions (Table 9). The most common basis for complaint, both statewide and in non-entitlement jurisdictions, is disability. Among non-entitlement jurisdictions, the second most commonly cited basis for complaint is race, followed by familial status.

Table 9: Summary of Civil Rights Cases in Ohio (January 1, 2015 to December 31, 2019)		
	All Ohio	Non-Entitlement
Total Cases	2,101	414
No Cause	36.8%	34.5%
Race	29.1%	19.5%
Disability	58.0%	64%
Sex	13.3%	11.5%
National Origin	5.0%	2.4%
Color	1.5%	1.4%
Familial Status	13.7%	14.4%
Religion	1.8%	1.4%
Retaliation	12.5%	10.9%

Source: Ohio Civil Rights Commission

Resolution of Federal Housing Discrimination Complaints

Complaints can be resolved, or closed, in several ways by HUD and/or FHAP agencies. One means of closure is through conciliation, settlement or other resolution, arranged either privately or through the investigating agency. Conciliation/settlement accounted for 28.6% of all closures between January 1, 2015 and December 31, 2019. Cases closed because no reasonable basis was found for the complaint account for 36.8% of all complaints. “Administrative” closures (complaint withdrawn by complainant, unable to locate complainant, complainant failure to cooperate, or lack of jurisdiction) account for 19.9% of complaints. Statewide, a total of five cases of discrimination were found through an administrative hearing, one FHAP judicial consent order was determined, and discrimination was found through litigation in one case. Maps 10 to 17 provide a statewide overview of all housing discrimination complaints closed with Conciliation/Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found between January 1, 2015 and December 31, 2019. All reported cases of discrimination are included in Appendices 10-14.

Fair Housing Initiatives Program

The Fair Housing Initiatives Program (FHIP) was created under Section 561 of the Housing and Community Development Act of 1987 to help promote equal housing opportunities. Under it, HUD provides funding to public, private, and nonprofit groups to conduct fair housing enforcement and education activities. The role of local programs created under FHIP is to:

- 1) Increase compliance with the Fair Housing Act and substantially equivalent state and local fair housing laws;
- 2) Educate the public and housing industry about their rights and responsibilities under the Fair Housing Act; and
- 3) Establish a network of experienced fair housing enforcement organizations throughout the country.

FHIP has three currently funded initiatives. The initiatives are:

Education and Outreach Initiative (EOI)

EOI offers a comprehensive range of support for fair housing activities, providing funding to state and local government agencies and non-profit organizations for initiatives that educate the public and housing providers about equal opportunity in housing and compliance with the fair housing laws.

Private Enforcement Initiative (PEI)

PEI offers a range of assistance to the nationwide network of fair housing groups. This initiative funds non-profit fair housing organizations to carry out testing and enforcement activities to prevent or eliminate discriminatory housing practices.

Fair Housing Organizations Initiative (FHOI)

FHOI provides funding that builds the capacity and effectiveness of non-profit fair housing organizations by providing funds to handle fair housing enforcement and education initiatives more effectively. FHOI also strengthens the fair housing movement nationally by encouraging the creation and growth of organizations that focus on the rights and needs of underserved groups, particularly persons with disabilities.

Eight fair housing organizations in Ohio received FHIP grants between 2015 and 2017 (Table 10; Appendix 15). Of the six organizations that received funding for the Private Enforcement Initiative, five received additional grants for the Education and Outreach Initiative. Two organizations received funding exclusively for the Education and Outreach Initiative.

Organization	City	Initiative
Fair Housing Contact Services, Inc.	Akron	PEI, EOI
Housing Opportunities Made Equal of Greater Cincinnati, Inc.	Cincinnati	PEI, EOI
Housing Research & Advocacy Center	Cleveland	PEI
Central Ohio Fair Housing Association, Inc.	Columbus	EOI
Ohio State Legal Services Association	Columbus	EOI
Miami Valley Fair Housing Center, Inc.	Dayton	PEI, EOI
Fair Housing Resource Center, Inc.	Painesville	PEI, EOI
Fair Housing Opportunities of Northwest Ohio Inc.	Toledo	PEI, EOI

Source: U.S. Department of Housing and Urban Development

These FHIP organizations provide important services to further fair housing in Ohio. Their direct services to clients serve as a less formal alternative to filing a government complaint. Their programs, designed to prevent or eliminate discriminatory housing practices, include:

- Conducting complaint intake and investigations;
- Mediating and litigating housing discrimination complaints;
- Testing the housing, lending, and insurance markets;
- Administrating judicial enforcement of federal, state, and local fair housing laws; and
- Providing education and outreach programs to inform the public about fair housing laws.

Section 6: Partnerships

OCD collaborates with local governments, fair housing organizations, state agencies, and other stakeholders at an annual Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee meeting. In addition, OCD works closely with the Coalition on Homelessness and Housing in Ohio (COHHIO) and the Ohio Housing Finance Agency (OHFA) to address fair housing issues associated with homelessness and access to affordable housing.

Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee

As part of the citizen participation process for the Ohio Consolidated Plan, OCD convenes a Fair Housing/New Horizons Fair Housing Assistance Program Advisory Committee each year. The committee meeting is open to the public and OCD draws committee members from fair housing organizations, the Ohio Civil Rights Commission, COHHIO, OHFA, entitlement and non-entitlement local governments, advocacy organizations, and state agencies. Table 11 lists organizations that served on the Fair Housing/New Horizons committee between 2015 to 2019. Three of Ohio’s eight recently funded FHIP organizations - Housing Research & Advocacy Center, Miami Valley Fair Housing Center, Inc., and the Toledo Fair Housing Center (Fair Housing Opportunities of Northwest Ohio Inc.) – serve on the committee. The annual meeting provides an opportunity for a wide array of stakeholders to engage in productive discussion regarding OCD’s programs, fair housing requirements, and training efforts. The committee also discusses the state of fair housing in Ohio, and offers recommendations on how OCD can enhance training and outreach to address specific issues.

Participant Organization	Type of Organization
The Ability Center of Greater Toledo	Center for Independent Living
Hocking, Athens, Perry Community Action Agency	Community Action Agency
WSOS Community Action	Community Action Agency
Ohio Regional Development Corporation	Development Consultant
Toledo Fair Housing Center	Fair Housing Organization (FHIP)
Housing Research & Advocacy Center	Fair Housing Organization (FHIP)
Miami Valley Fair Housing Center	Fair Housing Organization (FHIP)
Greene County	Local Government
City of Fairborn	Local Government
City of Chillicothe	Local Government
Ashtabula County	Local Government
Gallia County	Local Government
City of Cambridge	Local Government
Coalition on Housing and Homelessness in Ohio	Non-profit Organization
Advocates for Basic Equality	Legal Aid
Ohio Poverty Law Center	Legal Aid
Seneca Regional Planning Commission	Regional Planning Commission
Trumbull County Planning Commission	Regional Planning Commission
Buckeye Hills Regional Council	Council of Local Governments

Ohio Attorney General Office	State Agency
Ohio Civil Rights Commission	State Agency (FHAP)
Ohio Development Services Agency	State Agency
Ohio Housing Finance Agency	State Agency

Source: Ohio Development Services Agency

Coalition on Homelessness and Housing in Ohio (COHHIO)

COHHIO is involved in a range of housing assistance services in Ohio, including homeless prevention, emergency shelters, transitional housing and permanent affordable housing with linkages to supportive services. COHHIO assists hundreds of housing organizations and homeless service providers in Ohio through public policy advocacy, training and technical assistance, research and public education.

COHHIO is one of OCD’s key technical assistance partners, completing the *State of Homelessness Report* and overseeing the Ohio Balance of State Continuum of Care program, which carries out planning responsibilities for and represents the 80 rural counties in Ohio. COHHIO also partners with OCD to provide specialized training and technical assistance regarding the nuanced intersection of fair housing law and Ohio Landlord-Tenant Law (Ohio Revised Code 5321).

As part of OCD’s required Standard Fair Housing Program, local government grantees must have a local fair housing contact to receive, process, and address complaints. The local fair housing contact must be able to discern if a complaint is associated with a protected class under the Fair Housing Act, and, if it is, work with the complainant to formally submit the case to the Ohio Civil Rights Commission. Often, however, complaints fall under Ohio Landlord-Tenant Law, and have no recourse under the Fair Housing Act. In such cases, local fair housing contacts are often unequipped to provide guidance. COHHIO’s toll-free Tenant Rent Information Line addresses this need, and provides an invaluable resource for OCD grantee local fair housing contacts.

Ohio Housing Finance Agency (OHFA)

OHFA facilitates developing, rehabilitating and financing low- to moderate-income housing. The Agency's programs help first-time homebuyers, renters, older adults, and others find quality affordable housing that meets their needs. Formerly a division of the Ohio Development Services Agency, OHFA became an independent state agency on July 1, 2005, through Amended Substitute House Bill (HB) 431. OHFA funds competitive fixed-rate mortgage loans and provides financing for developing and rehabilitating affordable rental housing through the Housing Tax Credit program, issuing tax-exempt mortgage revenue bonds, and other affordable housing programs.

OHFA helps low- to moderate-income Ohioans purchase homes and provides opportunities through financing quality and affordable rental housing. The Agency offers financial incentives for developers to increase the supply of affordable rental housing. OHFA administers different funding programs, including the Housing Tax Credit program, which for-profit and nonprofit developers can use to develop new or rehabilitate existing affordable rental housing. The Agency helps property managers maintain safe, affordable housing environments through its compliance programs. OHFA monitors more than 1,000 multifamily properties throughout the

state. Finally, the Agency provides financing for competitive fixed-rate mortgages by issuing tax-exempt mortgage revenue bonds and partners with real estate professionals and mortgage lenders. Since 1983, OHFA has provided more than \$11 billion in affordable mortgage loans to more than 162,000 Ohioans. Since 1986, OHFA has allocated more than \$7 billion in housing credits for the creation and preservation of more than 1,500 active properties with more than 134,000 affordable rental housing units.

OHFA is governed by an 11-member board. The Board consists of the Directors of the Ohio Department of Commerce and Ohio Development Services Agency, and nine public members. The Governor appoints the nine public members for six-year terms to represent various housing sectors and the public. The Director of the Ohio Development Services Agency serves as Chairman of the Board.

OHFA serves as a critical partner to ODSA in preserving and developing affordable housing, as well as in affirmatively furthering fair housing, in Ohio. ODSA partners with OHFA to fund the Housing Development Assistance Program with HOME Investment Partnership funds and funds from the Ohio Housing Trust Fund. Through this program, OHFA primarily facilitates developing and preserving affordable housing units, including those serving individuals with mental health issues and developmental disabilities. All projects financed with OHFA multifamily funding are required to have Affirmative Fair Housing Marketing Plans.

Section 7: State of Ohio Identified Impediments & Action Plan

Impediments Identified in Non-entitlement Analyses of Impediments to Fair Housing Choice

The State of Ohio operates on a five-year Consolidated Plan cycle, and OCD requires non-entitlement local government grantees to conduct a new Analysis of Impediments to Fair Housing Choice (AI) at the beginning of each cycle as part of their Standard Fair Housing Program. In the intervening years, grantees prepare an update to the AI. Grantees submit the AI documents and the annual updates to OCD for review, and the most recent full AI submission coincided with state fiscal year 2019.

A survey analysis of the submitted 2019 non-entitlement grantee AI documents reveals several commonly identified impediments:

1. *Lack of affordable housing:* The vast majority of local governments, 74%, indicated that the most significant impediment to fair housing in their community was the lack of affordable rental units. For older adults and people with disabilities, affordable housing choices are even harder to locate.
2. *Need for Fair Housing Education:* In many communities, the general public is simply unaware of fair housing laws. A significant proportion of local governments - 72% - indicated that a lack of fair housing educational opportunities is a severe impediment to fair housing. If people do not know their rights, they will not file complaints and impediments cannot be addressed. In addition, housing providers may not be aware of applicable fair housing laws, and they may intentionally or unintentionally create impediments to fair housing choice. Local governments noted a strong need for improved education for the general public, local government officials, social service agencies and housing providers.
3. *Lack of accessible housing:* 56% of local governments indicated that the lack of accessible rental units was a significant impediment to fair housing, particularly for older adults and disabled populations.
4. *Limited access to public transit in rural areas:* The scarcity of public transit options in Ohio's small cities and rural communities presents impediments to housing choice for those with disabilities, older adults, and individuals without personal automobiles. Access to transportation options in many cases may be the sole determination of where a family or individual is able to seek housing.

Table 12: Survey Analysis of Non-entitlement Analyses of Impediments to Fair Housing Choice in Ohio: 2016 to 2019	
Impediment	Percent Identifying
Lack of affordable housing	74%
Need for Fair Housing education	72%
Lack of accessible housing	56%
Lack of affordable/accessible housing for individuals with disabilities	51%
Lack of public transportation	38%
Lending issues (e.g. predatory lending, discrimination, lack of financial literacy)	28%
Lack of affordable/accessible housing for seniors	26%
Exclusionary Zoning	25%
Poor condition of housing stock	21%
Fair Housing Enforcement	19%
Lack of building codes/code enforcement	13%
Lack of transitional housing	13%
Lack of understanding/failure to make reasonable accommodations/modifications	12%
Lack of housing for larger families	8%
Language barriers (Spanish)	7%
Lack of employment opportunities	7%
NIMBY	6%
Segregation	5%
Discriminatory advertising practices	4%
Lack of public infrastructure	4%

Source: Ohio Development Services Agency

The three most commonly identified impediments in non-entitlement grantee analyses - lack of affordable housing, lack of education or understanding of Fair Housing laws, and lack of accessible housing – are reflected in the State of Ohio’s identified impediments, as discussed below. The fourth most commonly cited impediment – limited access to public transit – is a critical issue that is being addressed by the Ohio Department of Transportation.

Impediment: Limited access to public transit in rural areas

The scarcity of public transit options in Ohio’s small cities and rural communities presents impediments to housing choice for those with disabilities, older adults, and individuals without personal automobiles. Access to transportation options in many cases may be the sole determination of where a family or individual is able to seek housing.

Tactics

According to the Ohio Department of Transportation, Ohio’s 34 rural transit agencies spend about \$38 million a year to provide service. Although this is a small portion (about 4%) of the

overall transit investment, rural services operate in 35 counties and provide more than 2 million trips annually.

About half of existing funding for rural agencies comes from the federal government. Many rural areas also raise funds by contracting with human service agencies and other partners. Local funds, passenger fares and state funds are also important resources for the rural agencies.

There are about 550 vehicles in Ohio's rural fleet. An estimated 150 buses and vans are past their useful life and need to be replaced in the immediate term.

Rural areas also need more service. The analysis found a current need for an additional 1 million transit trips. By 2025, as Ohio's rural population continues to grow older and rely more on public transit, the need for service will grow to more than 4 million trips each year.

This estimate does not include the 27 Ohio counties that do not have any existing public transit service. These communities currently need roughly 2 million trips and are expected to need 3 million trips per year by 2025.

The 2015 investment needs for rural communities include:

- *System Preservation* - \$22 million to replace vehicles already beyond their useful lives, and \$11 million to purchase vehicles expiring in 2015 and fund other infrastructure needs.
- *System Expansion* - \$18 million to operate and \$11 million to purchase vehicles for additional service in areas that already have some transit.
- *New Systems* - \$48 million for transit service in the 27 counties that currently have none.

Noted Benefits of Investing in Rural Transit

- Ensure all Ohio residents have access to some public transportation. Expanding service to areas that currently do not have public transportation would reach an estimated 1 million individuals.
- Provide access to jobs, job training, health care and basic personal services. Expanding mobility is important statewide, but especially for people living in Ohio's small towns and rural communities and for employers needing a workforce that can get to work. Transportation needs in these areas are expected to increase as their populations grow older and poorer. Investing in services now will ensure the state has infrastructure in place to support individuals, Ohio businesses and health and human service programs.

The Ohio Department of Transportation's recommended short-term strategies to invest in rural transit to meet the needs of older adults, disabled, and low-income individuals and households include:

- Incentivize coordination between human service and public transportation. Grants may also support extending or providing service in counties where none exist.
- Establish a cabinet-level Human Service Transportation Coordinating Committee to examine statewide policies to encourage coordinated transportation services. Largely aimed at rural counties and systems, this committee would include, at minimum, the Ohio Department of Job and Family Services, Ohio Department of Medicaid, Ohio Department of Aging, and Ohio Department of Transportation.

- Establish a Blue Ribbon Funding Committee to identify and move forward a statewide dedicated public transportation funding source. This would benefit urbanized areas and also address significant rural transit needs.

State of Ohio Identified Impediments & Action Plan

Impediment: Lack of affordable housing

The statewide shortage of affordable housing limits housing choice and disproportionately impacts members of protected classes, especially minority populations, families with large households, and individuals with disabilities.

Tactics

The Office of Community Development (OCD) will continue to offer a variety of affordable housing programs that leverage federal and state funds. Ohio's affordable housing programs have been supported by the following sources of funds since 1993:

- Community Development Block Grant (CDBG) – Federal
- Ohio Housing Trust Fund (OHTF) – State
- Neighborhood Stabilization Program (NSP) – Federal
- National Housing Trust Fund (NHTF) – Federal
- HOME Investment Partnerships Program (HOME) – Federal

OCD provides communities and nonprofit organizations with funding to help preserve and expand the affordable single-family housing stock in Ohio, promote affordable housing opportunities and improve housing conditions for low-income families through the Housing Assistance Grant Program and the Community Housing Impact and Preservation (CHIP) Program.

- Housing Assistance Grant Program: This program is available to nonprofit agencies that contract with local, qualified construction companies to complete home repairs and renovations. The program enables homeowners at or below 50% of area median income to stay in their homes by providing essential home repairs and renovations for handicap accessibility.
 - Approximate Budget for two-year Grant: \$4.5 Million
 - Approximate Outcome for two-year Grant: 1,570 Households
- Community Housing Impact and Preservation (CHIP) Program: This program is available to local governments to preserve and improve the affordable housing stock for low-to-moderate income Ohioans and strengthen neighborhoods through community collaboration. CHIP activities include:
 - *Owner and Rental Rehabilitation Assistance* – corrects substandard conditions so that homes are safe, healthy, durable, energy-efficient, and affordable.
 - *Owner and Rental Repair Assistance* – corrects one or more specific deficiencies that adversely affect the occupants' health and safety and/or the house's structural integrity.

- *Homeownership Assistance* – provides assistance to families to purchase homes. It may include a subsidy to lower the interest rate for the loan and/or principal amount, providing down payments, and paying reasonable closing costs.
 - *Down Payment Assistance and Rehabilitation* – homeownership assistance combined with rehabilitation assistance on an existing home that does not meet applicable standards.
 - *Down Payment Assistance only* – homeownership assistance on a new or existing home that already meets applicable standards.
 - *New home construction in partnership with Habitat for Humanity* – homeownership assistance provided for a newly constructed home to a family qualified by a Habitat for Humanity affiliate.
- *Tenant-Based Rental Assistance* – provided to property owners to subsidize an income-eligible tenant's monthly rent payments. The assistance can also include security and utility deposits.
- Approximate Budget for two-year Grant: \$23 Million
- Approximate Outcome for two-year Grant: 873 Households

OCD also provides funds to the Ohio Housing Finance Agency (OHFA) to support the capacity of multi-family housing development organizations and provide financing for eligible housing developments to expand the decent, safe, affordable housing supply for very low- to moderate-income households. Funding is provided through OHFA for the Housing Development Assistance Program (HDAP) and the HOME Community Housing Development Organizations (CHDOs) Set-aside Program.

- Housing Development Assistance Program (HDAP): This program provides grants and loans to develop and preserve affordable housing. Awarded as soft funding, HDAP resources enable developers and owners of affordable housing to serve households at or below 50% of area median income (AMI).
 - Approximate Budget for four-year Grant: \$26 Million
 - Approximate Outcome for four-year Grant: 2,146 Households
- HOME Community Housing Development Organizations (CHDOs) Set-aside Program: The state of Ohio receives a yearly allocation of HOME funds from the U.S. Department of Housing and Urban Development. Fifteen percent (15%) of those funds must be "set-aside" to be awarded to CHDOs to develop housing. The Ohio Housing Finance Agency (OHFA) administers this program and distributes the set-aside funds for the state through its Housing Tax Credit (HTC) program in the form of gap financing for HTC developments.

OHFA offers several additional Multifamily Housing Development Programs that facilitate developing affordable housing, including the Housing Tax Credit Program, Housing Development Loan (HDL) Program, Multi-family Lending Program (MLP), and the Multi-family Bond Program.

- Housing Tax Credit Program: The Low-Income Housing Tax Credit (LIHTC) program is a tax incentive program designed to increase the quality, affordable rental housing supply by helping developers offset the costs of rental housing developments for individuals

with low- to moderate-income. This program has been the largest driver of producing new affordable housing in the state and nation over the past several years. Since 1987, OHFA has used the HTC program to facilitate developing more than 100,000 affordable rental housing units in Ohio.

- Housing Development Loan (HDL) Program: The Housing Development Loan (HDL) program provides short-term, low-interest loans to developers who have an award of housing credits through either the competitive (9%) Low-Income Housing Tax Credit round or the Bond Gap Financing (BGF) round. Funding comes from the Ohio Department of Commerce, Division of Unclaimed Funds.
- Multi-family Lending Program (MLP): The Multi-family Lending Program (MLP) provides long-term, permanent financing for multi-family rental housing developments that serve low- to moderate-income residents.
- Multi-family Bond Program: The multi-family bond program provides lower-cost debt financing for acquiring, constructing and substantially rehabilitating multi-family housing and single-family housing for low- and moderate-income residents by issuing tax-exempt mortgage revenue bonds

Impediment: Need for fair housing education

Non-entitlement local governments overwhelmingly indicate that citizens in their communities lack a basic understanding of fair housing rights. Local governments noted a strong need for improved education for the general public, local government officials, social service agencies and housing providers.

Tactics

- OCD will continue to require each local government grant recipient to develop and implement a Standard Fair Housing Program, which includes focused fair housing education and outreach (Appendix 9). Local governments must design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations or civic groups. In addition, to reach a broad community audience, local governments must also develop an annual plan to distribute fair housing brochures, pamphlets, posters and other informational materials to 10 area agencies, organizations, or public events.
- OCD will continue to operate the New Horizons Fair Housing Assistance Program. This program provides discretionary funds to units of local government, or consortia of units of local government, to implement innovative training, outreach, and planning activities that serve to affirmatively further fair housing. New Horizons fair housing strategies are based on locally assessed needs and further the state's fair housing goals. Eligible jurisdictions include direct Community Development Program Allocation cities and counties. OCD allocates up to \$50,000 annually to the New Horizons Fair Housing Assistance Program.

- OCD will encourage grantees to develop or strengthen relationships with the Ohio Civil Rights Commission (OCRC) to address discrimination in the community through services the Commission provides.

Impediment: Lack of accessible housing

An estimated 14% of Ohioans identify as having a disability, and 64% of discrimination complaints in non-entitlement communities are based on disability (Table 9; Appendices 10-14). This suggests that individuals with disabilities may face a disproportionate difficulty in accessing suitable housing.

Tactics

- All Ohio Housing Finance Agency (OHFA) funded projects, 5% of all units in each development shall meet Section 504 requirements. An additional 2% of all units shall be sensory compatible for persons with sight and hearing disorders. Site features and common areas shall be accessible including but not limited to dumpsters, outdoor grills, parking, play areas, and community shelters. Accessible units should be provided in a variety of unit configurations.
- OHFA will continue to endorse the Universal Design concept and all units utilizing OHFA resources must be designed to meet those principles to the greatest extent practicable. OHFA encourages developments to incorporate the Principles of Universal Design and the Goals of Universal Design.
- OHFA, Ohio Department of Medicaid (ODM), Ohio Department of Developmental Disabilities (DoDD) and Ohio Department of Mental Health and Addiction Services (OhioMHAS) partnered to implement the Ohio 811 Project Rental Assistance program. This program allows extremely low-income households composed of one or more adults with a disability to live in an integrated setting through rental subsidy and access to supportive services. Residents pay 30% of their income toward rent. The 811 program provides rental subsidy to cover the difference between the rental payment and the 50% tax credit rent for the unit. 496 units across Ohio have commitments for the program, 171 are under contract, and 22 are leased. The remaining units are undergoing environmental review or are under construction. All units are expected to be filled by 2023. Each rental assistance contract is for a 20-year period.
- Additionally, OHFA and the above-stated partners submitted a proposal to HUD in response to a NOFA for additional 811 Project Rental Assistance Program funds. Awards are expected to be announced by the end of summer 2020. If awarded, rental subsidy for an additional 250 housing units would be made available for qualifying individuals with disabilities.
- The Ohio Department of Medicaid Subsidy Demonstration (ODMSD) program is a partnership between ODM and OHFA that is similar to the 811 Project Rental Assistance program. ODMSD targets extremely low-income people with disabilities who are exiting facility-based settings and who require accessible housing. OHFA has awarded 15-year contracts to eight properties that will provide rental subsidy for 26 fully accessible units. An additional 10 units are under construction and expect to be leased by the end of the 2020. Residents pay 30% of their income toward rent. The ODMSD program provides

rental subsidy to cover the difference between the rental payment and the 50% tax credit rent for the unit.

- OCD will provide specialized training to grantees to facilitate an understanding of basic universal design principles.
- OCD will link grantees with resources, agencies and organizations in the community that serve disabled residents.
- OCD will discuss with communities how zoning and building codes can address housing barriers for disabled residents.



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Maps



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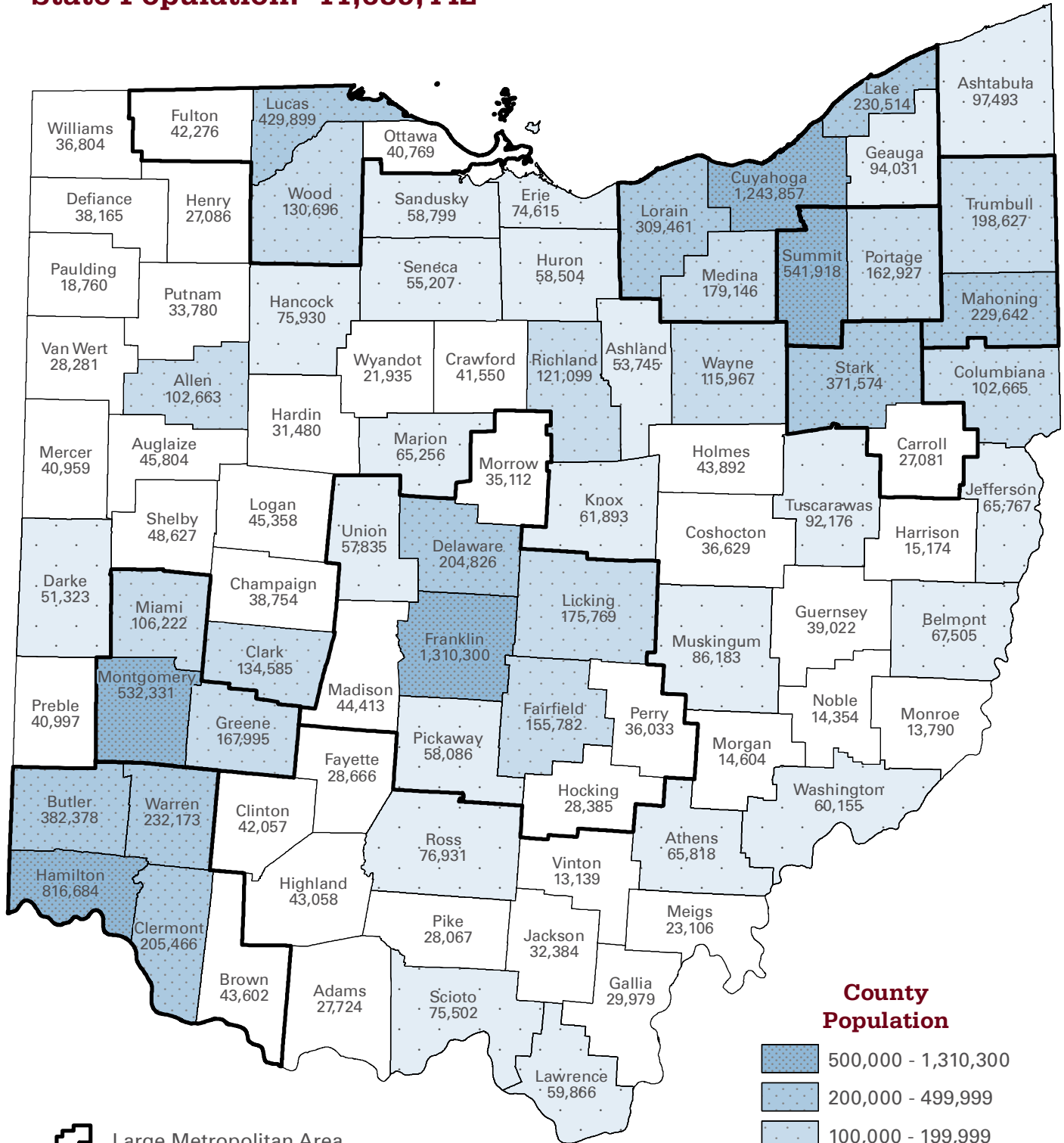
Map 1

Population Distribution 2018

Population Distribution 2018

State Population: 11,689,442

Ohio



Source: U.S. Census Bureau

Prepared by: Ohio Development Services Agency,
Office of Research (May 2019)



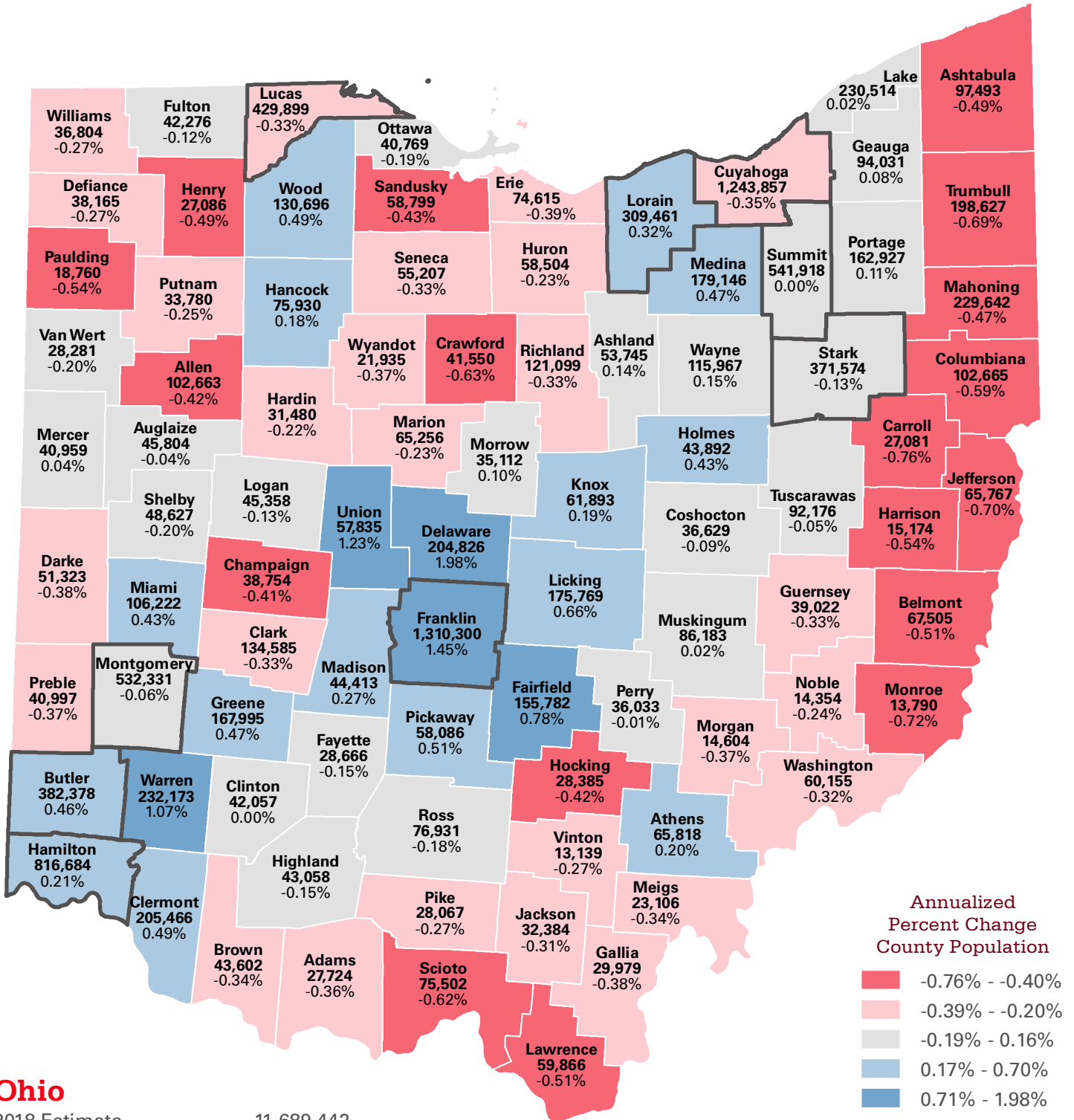
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Map 2

Percent Population Change, 2010 to 2018

Ohio County Population Estimates July 1, 2018

Annualized Percent Change
Census 2010 - July 1, 2018



Annualized Percent Change County Population

- -0.76% - -0.40%
- -0.39% - -0.20%
- -0.19% - 0.16%
- 0.17% - 0.70%
- 0.71% - 1.98%

County with population of 300,000 or more

Ohio
 2018 Estimate 11,689,442
 2010 Census Population 11,536,504
 Percent Change
 (Annualized) 2010 to 2018 +0.16% ■ Greater than Ohio

U.S.
 Percent Change
 (Annualized) 2010 to 2018 +0.70% ■ Greater than U.S.

Source: U.S. Census Bureau

Prepared by: Ohio Development Services Agency, Office of Research (April 2019)

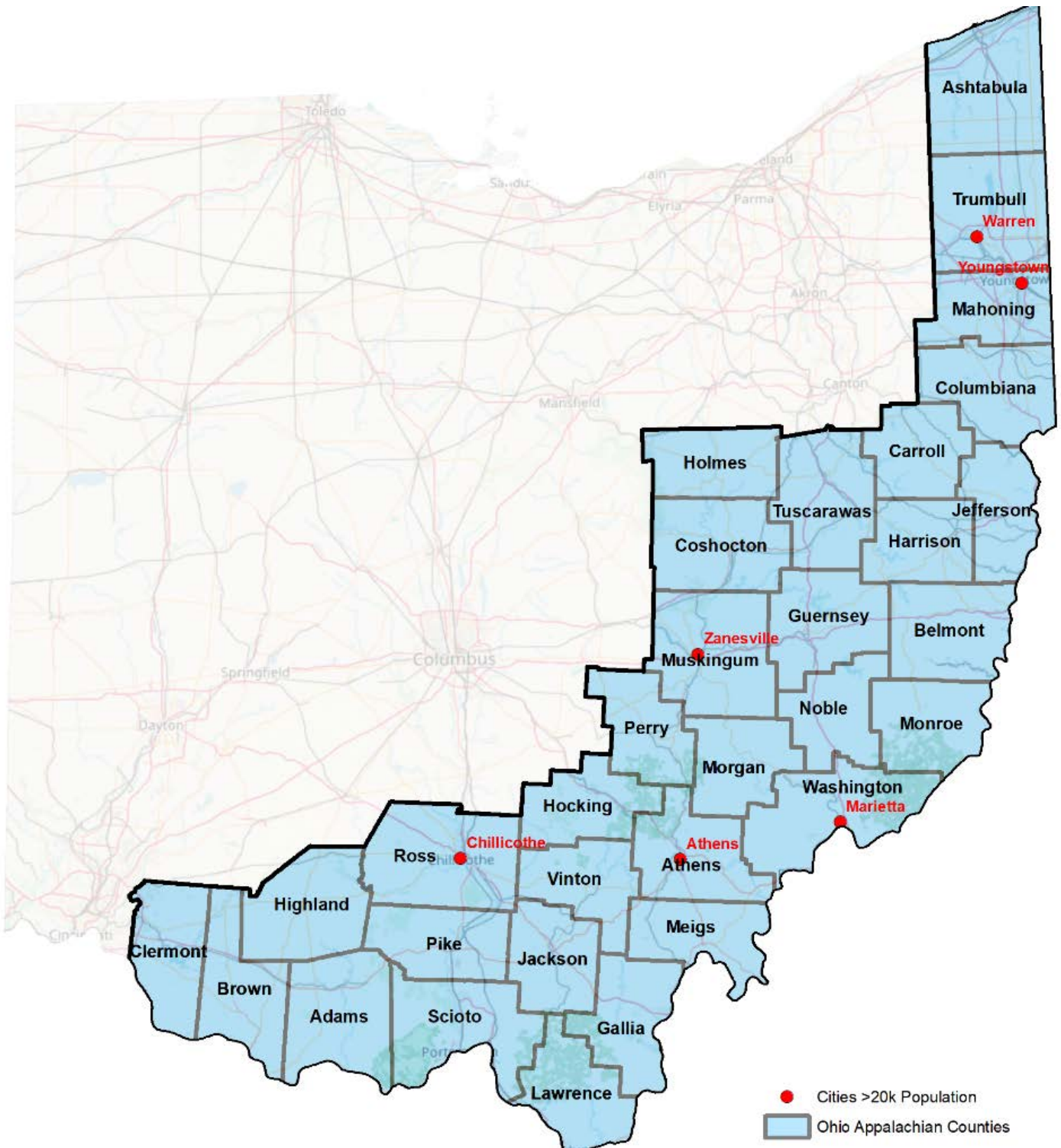


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Map 3

Ohio Appalachian Region

Ohio Appalachian Region



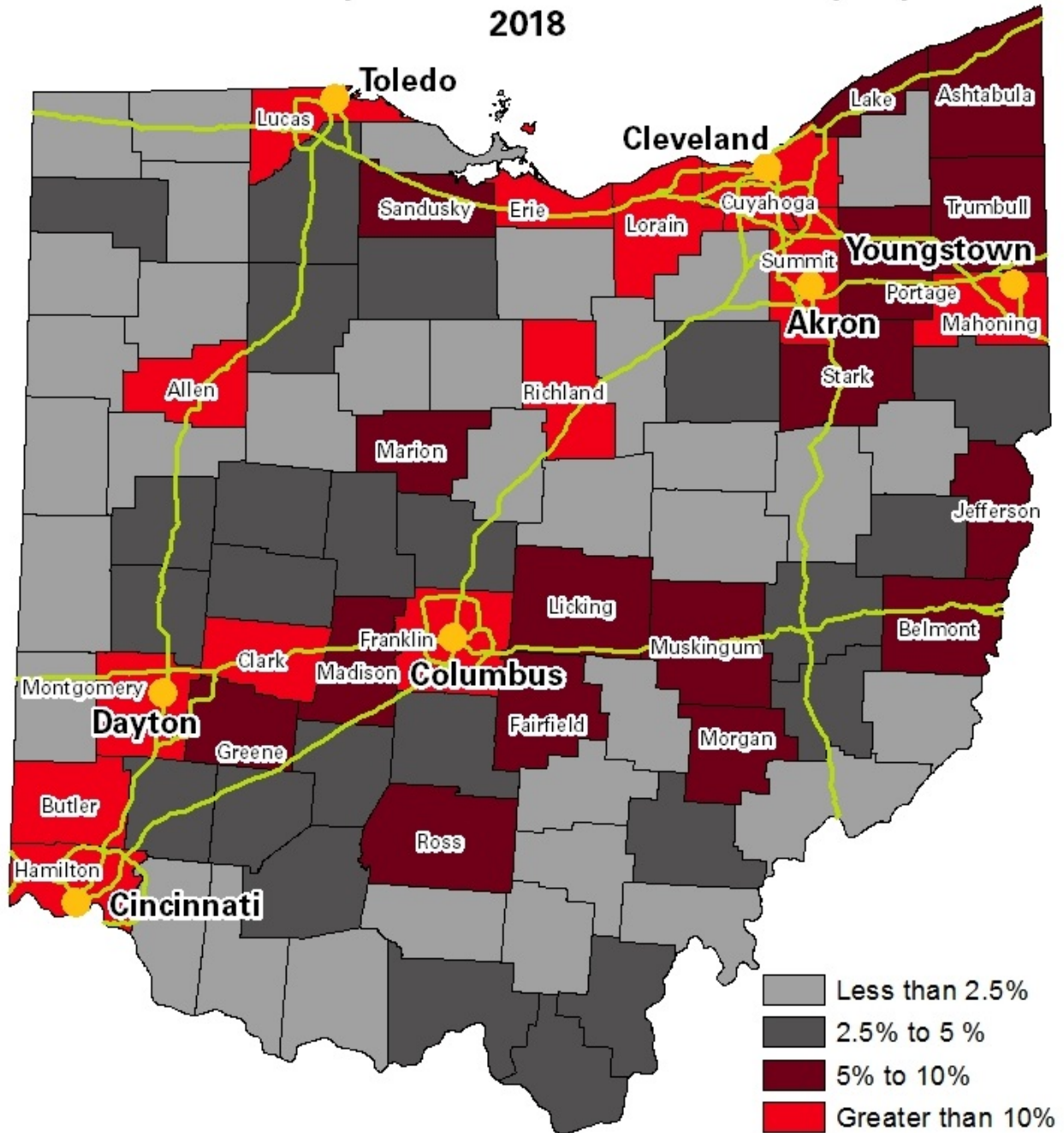


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Map 4

African American Population as Percent of County Population: 2018

African American Population as Percent of County Population: 2018



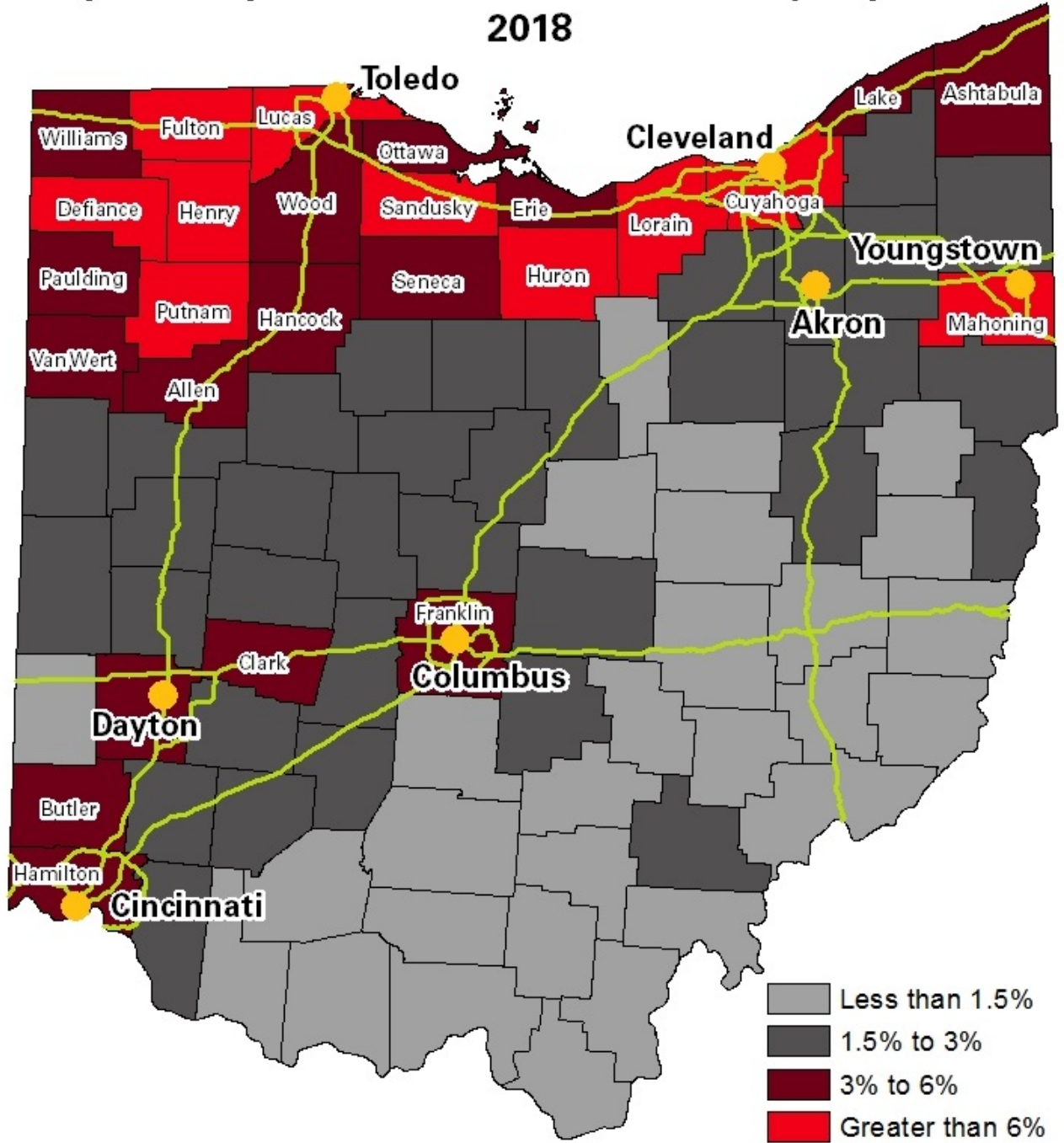


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Map 5

Hispanic Population as Percent of County Population: 2018

Hispanic Population as Percent of County Population: 2018



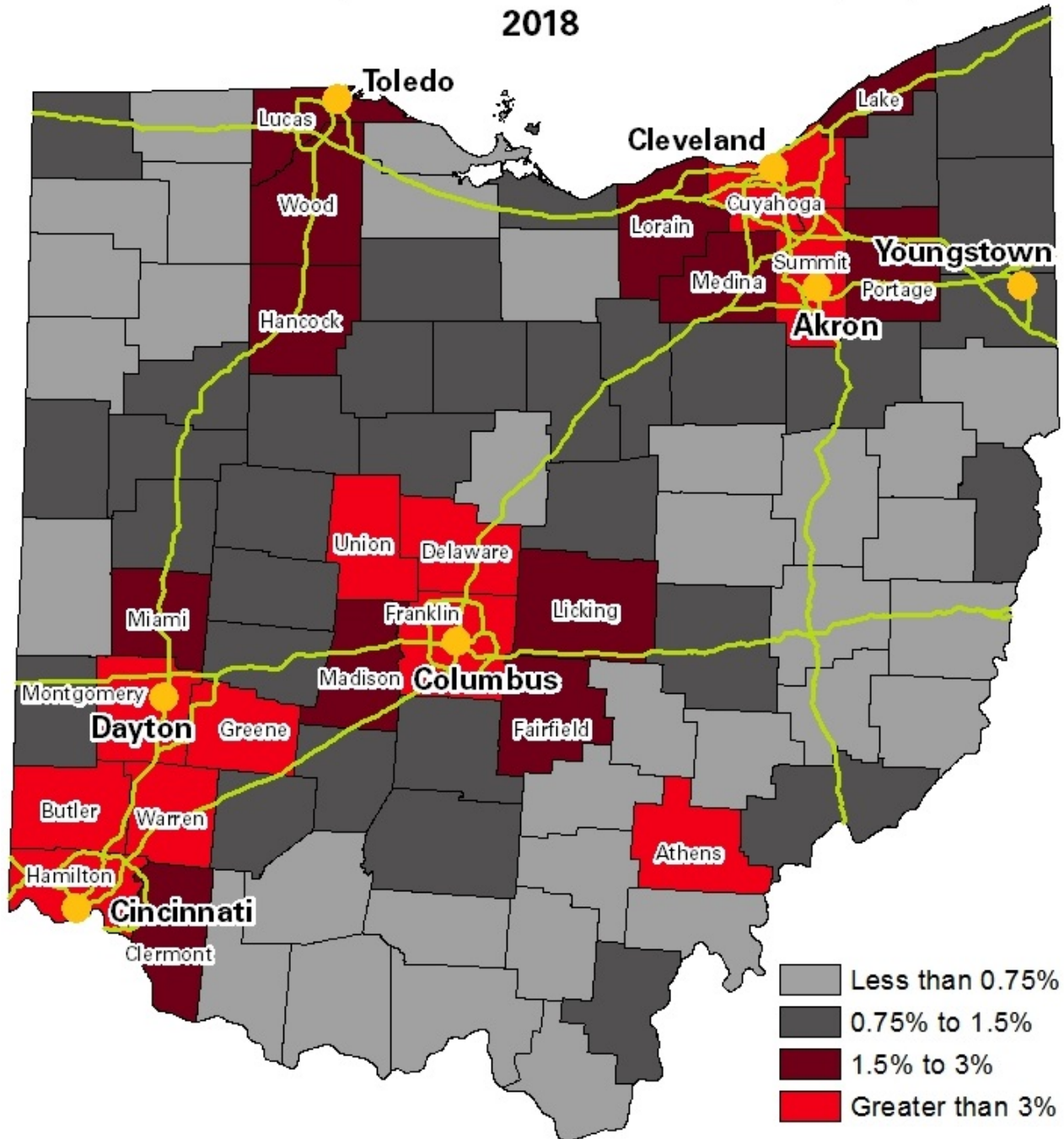


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Map 6

Asian Population as Percent of County Population: 2018

Asian American Population as Percent of County Population: 2018





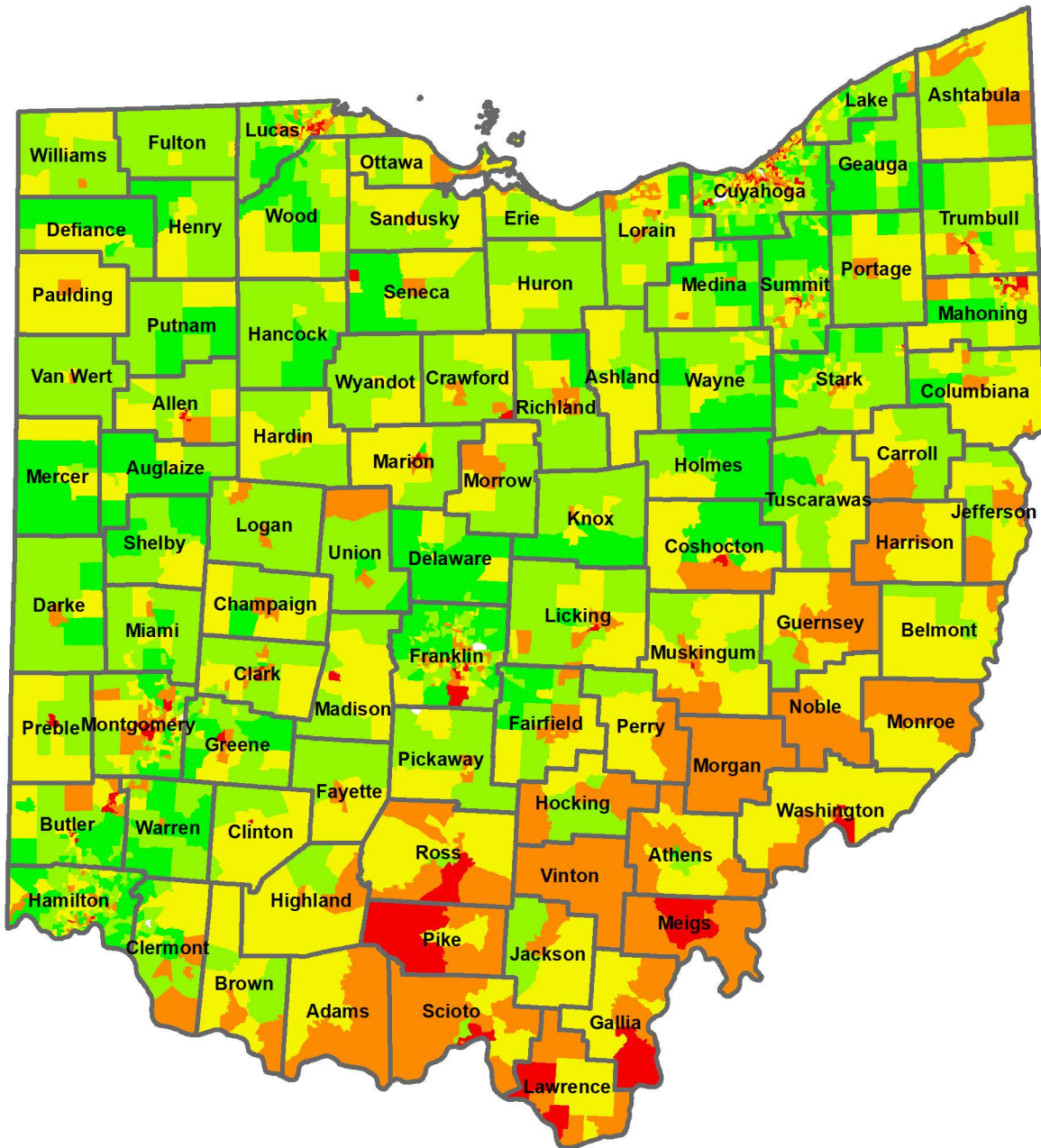
Map 7

Percent of Persons with a Disability by Census Tract

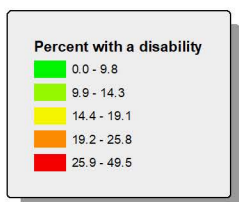
Percent of Persons with a Disability by Census Tract



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0 5 10 20 30 40 Miles



Ohio Development Services Agency
Office of Community Development
Source: 2018 5 Year ACS

Date: 3/9/2020



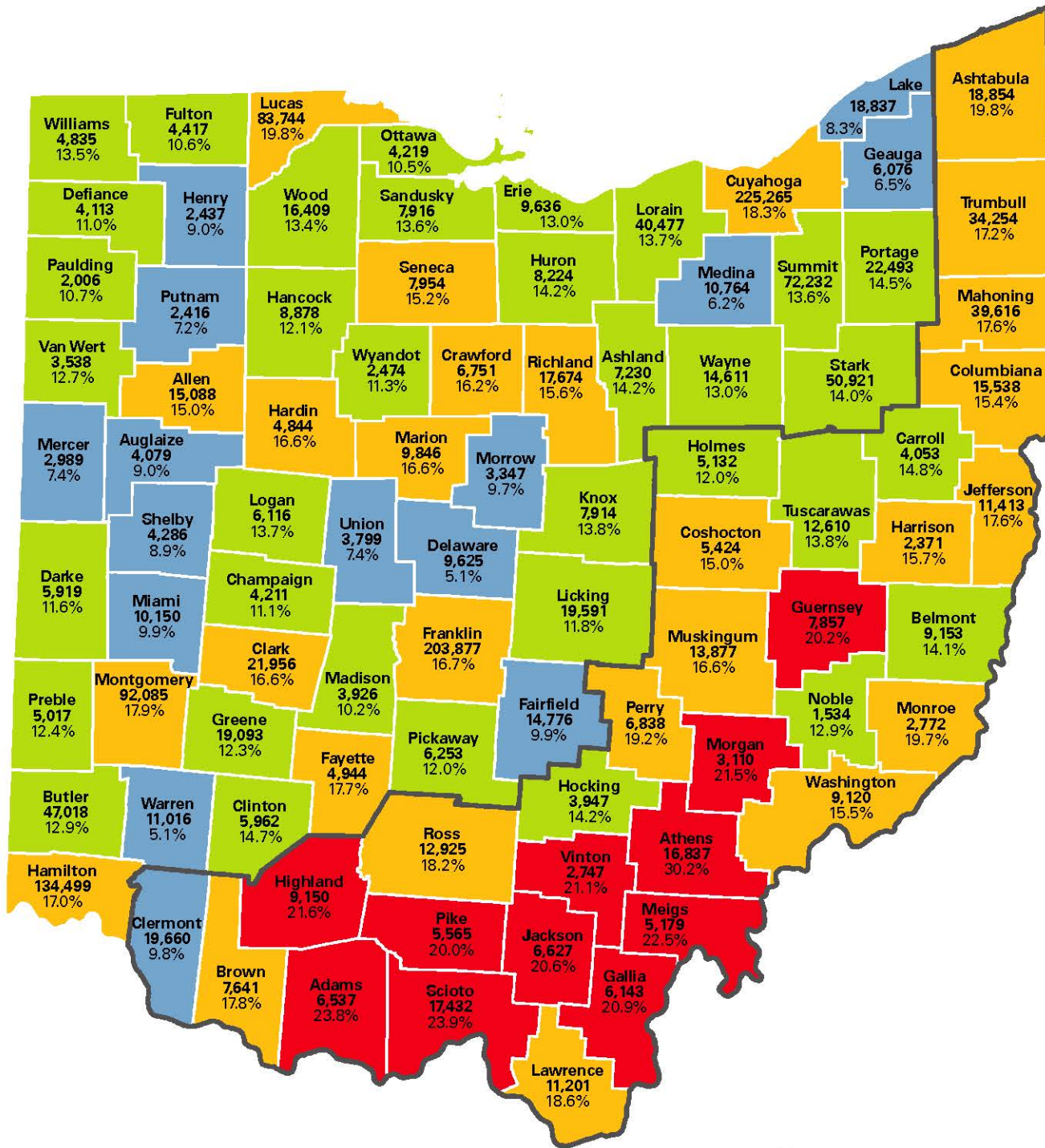
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Services Agency

Map 8

Poverty in Ohio by County

Ohio

Poverty in Ohio by County 2013-2017 American Community Survey



Statewide Poverty
1,683,890
14.9%

Percentage
County Population
in Poverty

- 5.1% - 9.9%
- 10.0% - 14.9%
- 15.0% - 19.9%
- 20.0% - 30.2%

Appalachian Ohio

This map shows the 2013-2017 American Community Survey estimates of the number and percentage of persons in poverty by county

Source:
2013-2017 American Community Survey,
U.S. Census Bureau

Prepared by:
Office of Research
Ohio Development Services Agency
January 2019



Development
Services Agency

Map 9

Civilian Unemployment Rate 2018

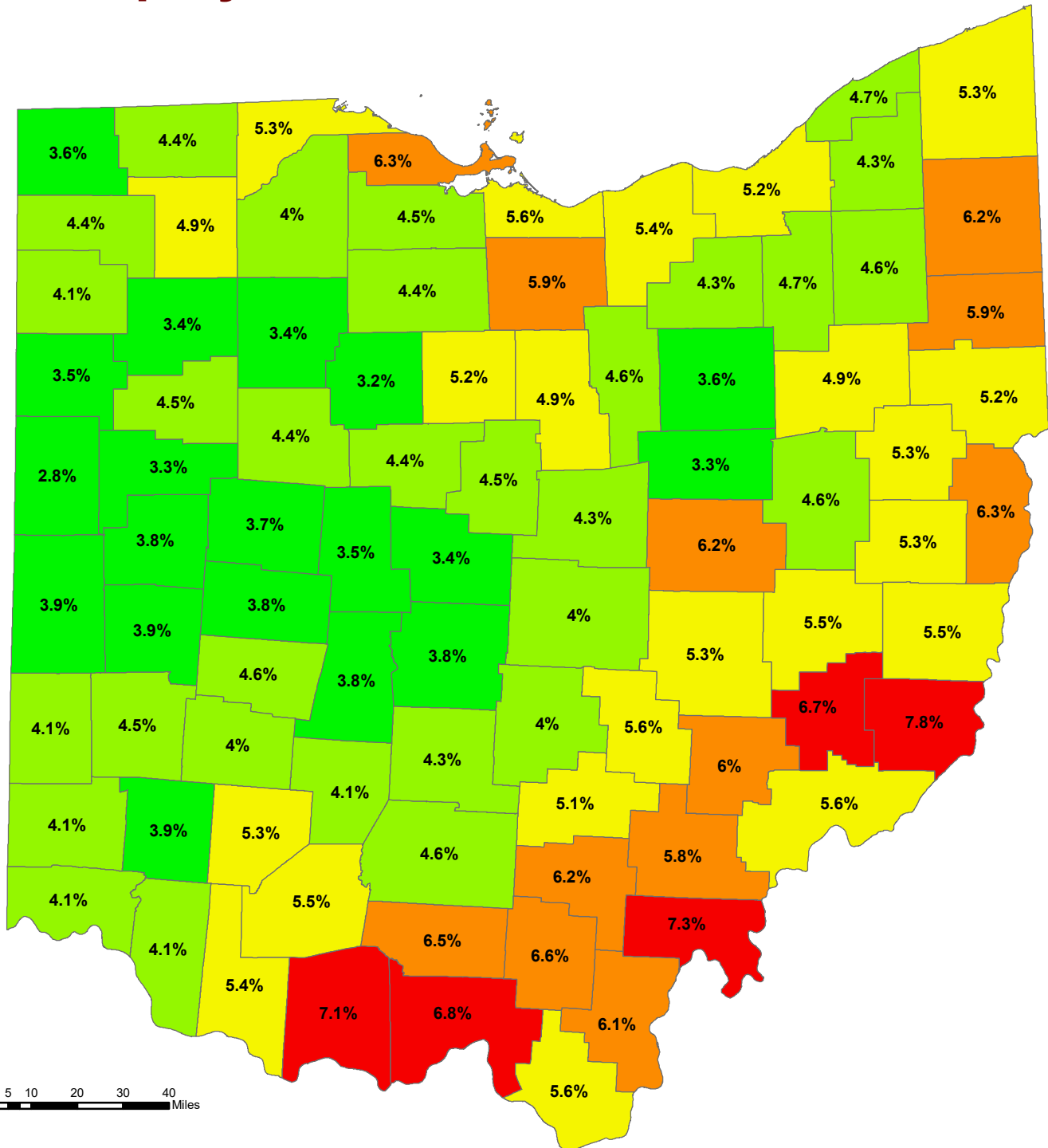
2018 Bureau of Labor and Statistics Unemployment Rate



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Lydia L. Mihalik, Director



Ohio Development Services Agency
Office of Community Development
Source: Bureau of Labor and Statistics

Date: 5/14/2020



Map 10

**Discrimination by Disability Cases
Reported with
Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

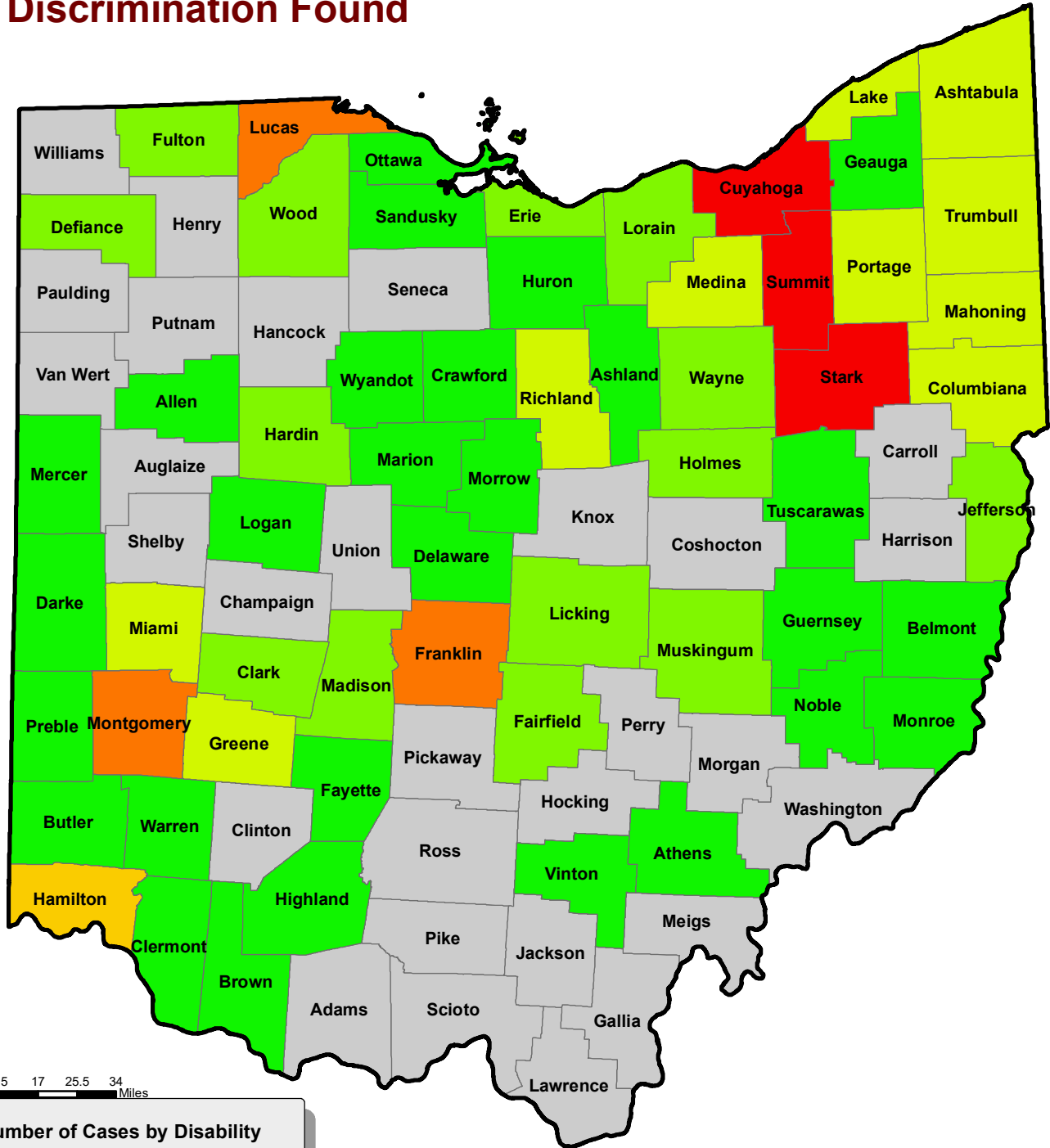
Map 10: CY2015-2019 Discrimination by Disability Cases Reported with Conciliation/Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found



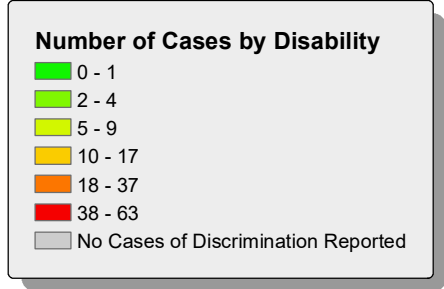
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Lydia L. Mihalik, Director



0 4.258.5 17 25.5 34 Miles



Ohio Development Services Agency
Office of Community Development

Date: 2/26/2020



Map 11

**Discrimination by Familial Status
Cases Reported with
Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

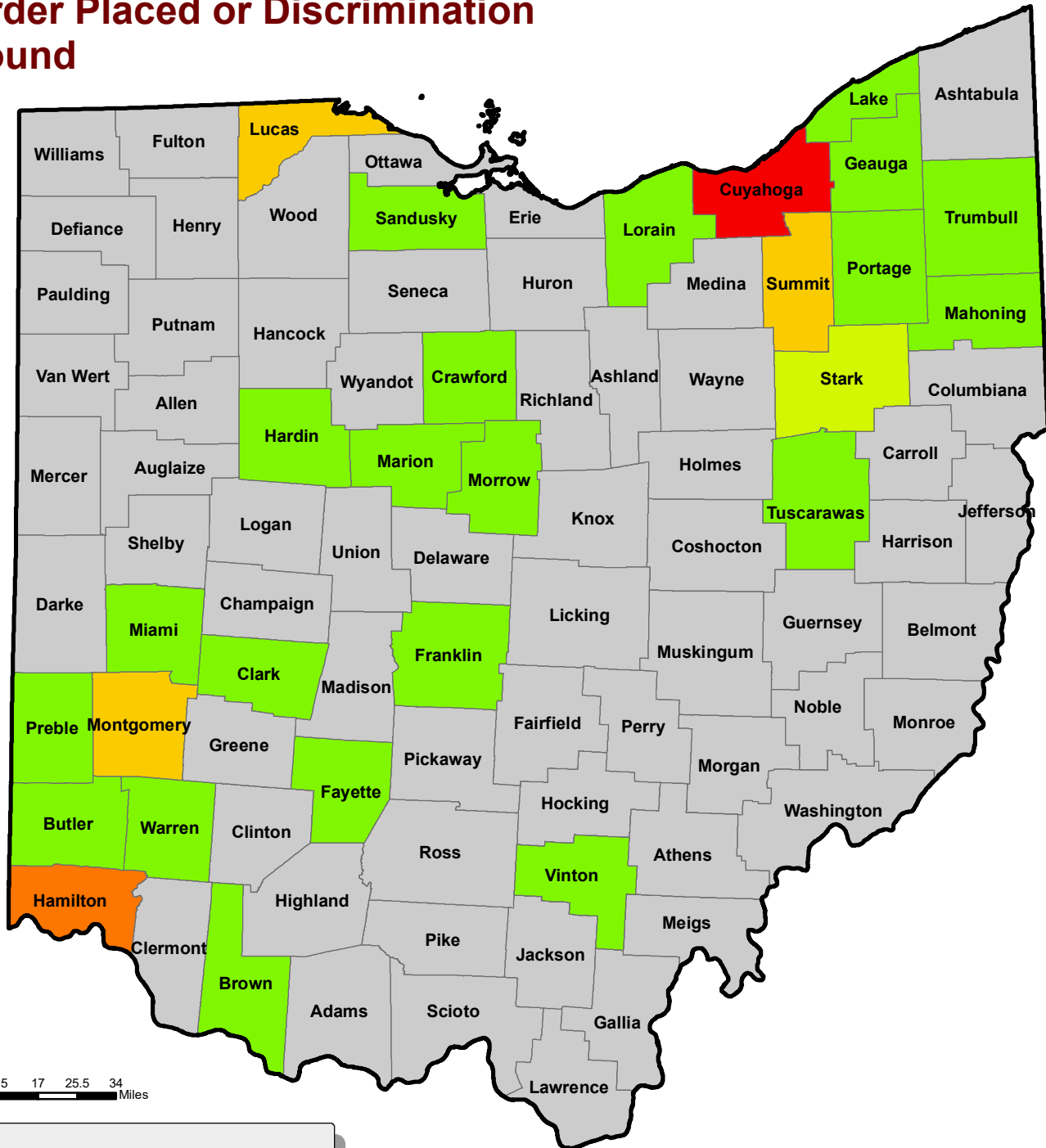
CY2015-2019 Discrimination by Familial Status Cases Reported with Conciliation/Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found



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0 4.258.5 17 25.5 34 Miles

Number of Cases by Familial Status

- Grey: No Cases
- Light Green: 1 - 2
- Yellow-Green: 3 - 9
- Yellow: 10 - 11
- Orange: 12 - 15
- Red: 16 - 39

Ohio Development Services Agency
Office of Community Development

Date: 2/26/2020

Map 12

**Discrimination by National Origin
Cases Reported with
Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

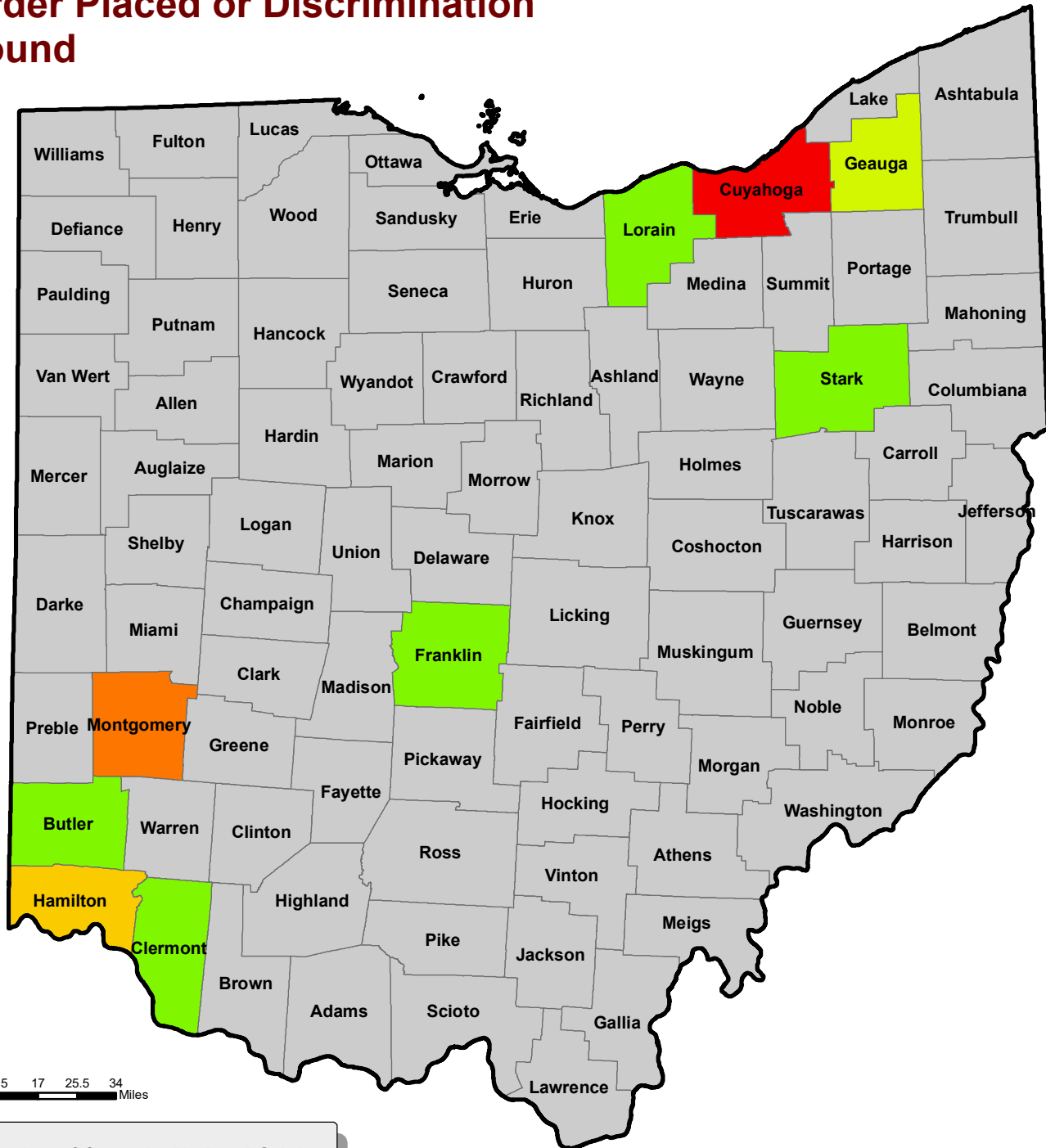
CY2015-2019 Discrimination by National Origin Cases Reported with Conciliation/Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found



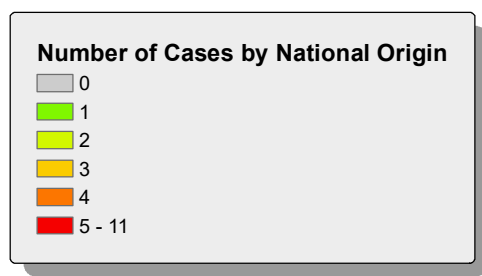
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0 4.258.5 17 25.5 34 Miles



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Date: 2/25/2020



Map 13

**Discrimination by Race Cases
Reported with
Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

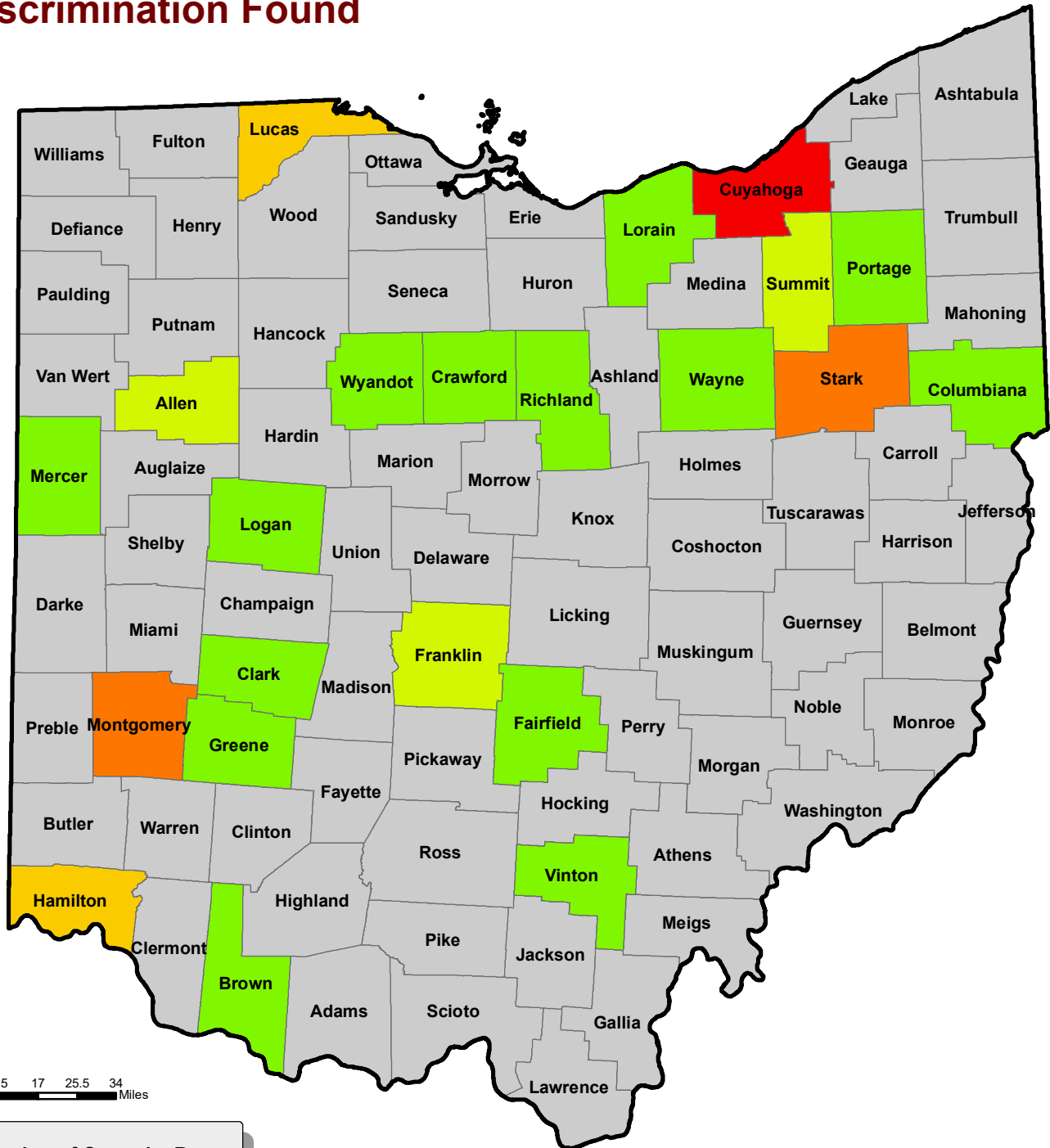
CY2015-2019 Discrimination by Race Cases Reported with Conciliation/ Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found



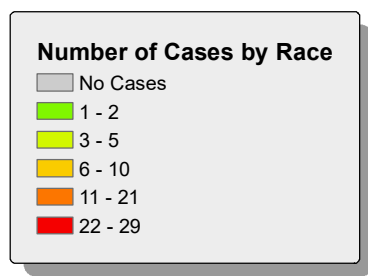
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0 4.258.5 17 25.5 34 Miles



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Office of Community Development

Date: 2/24/2020



Map 14

**Discrimination by Religion Cases
Reported with
Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

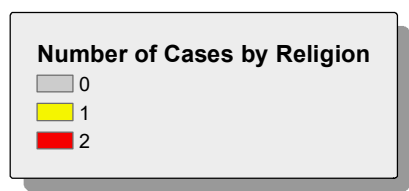
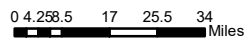
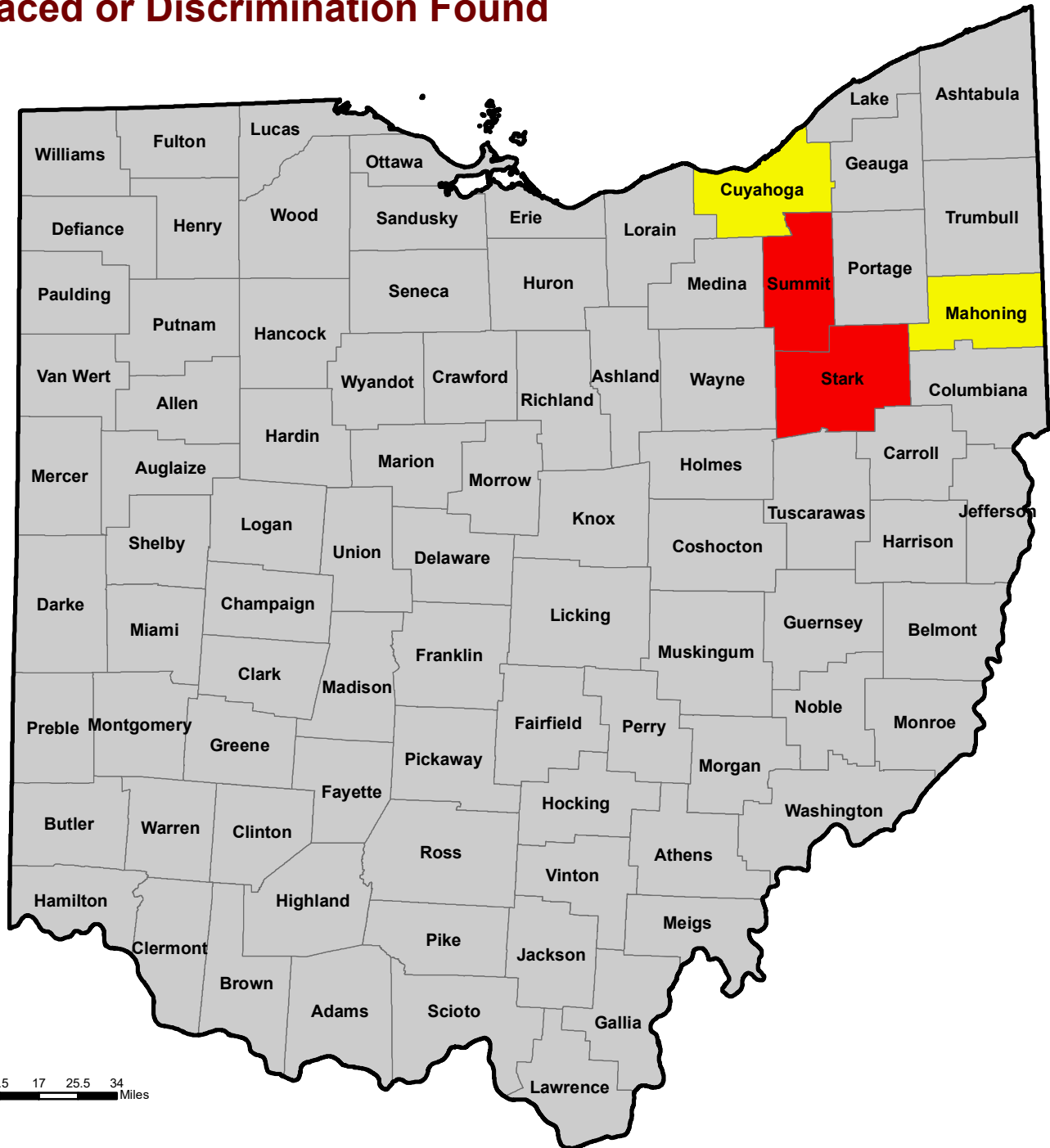
CY2015-2019 Discrimination by Religion Cases Reported with Conciliation/Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found



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Office of Community Development

Date: 2/26/2020

Map 15

**Discrimination by Retaliation Cases
Reported with
Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

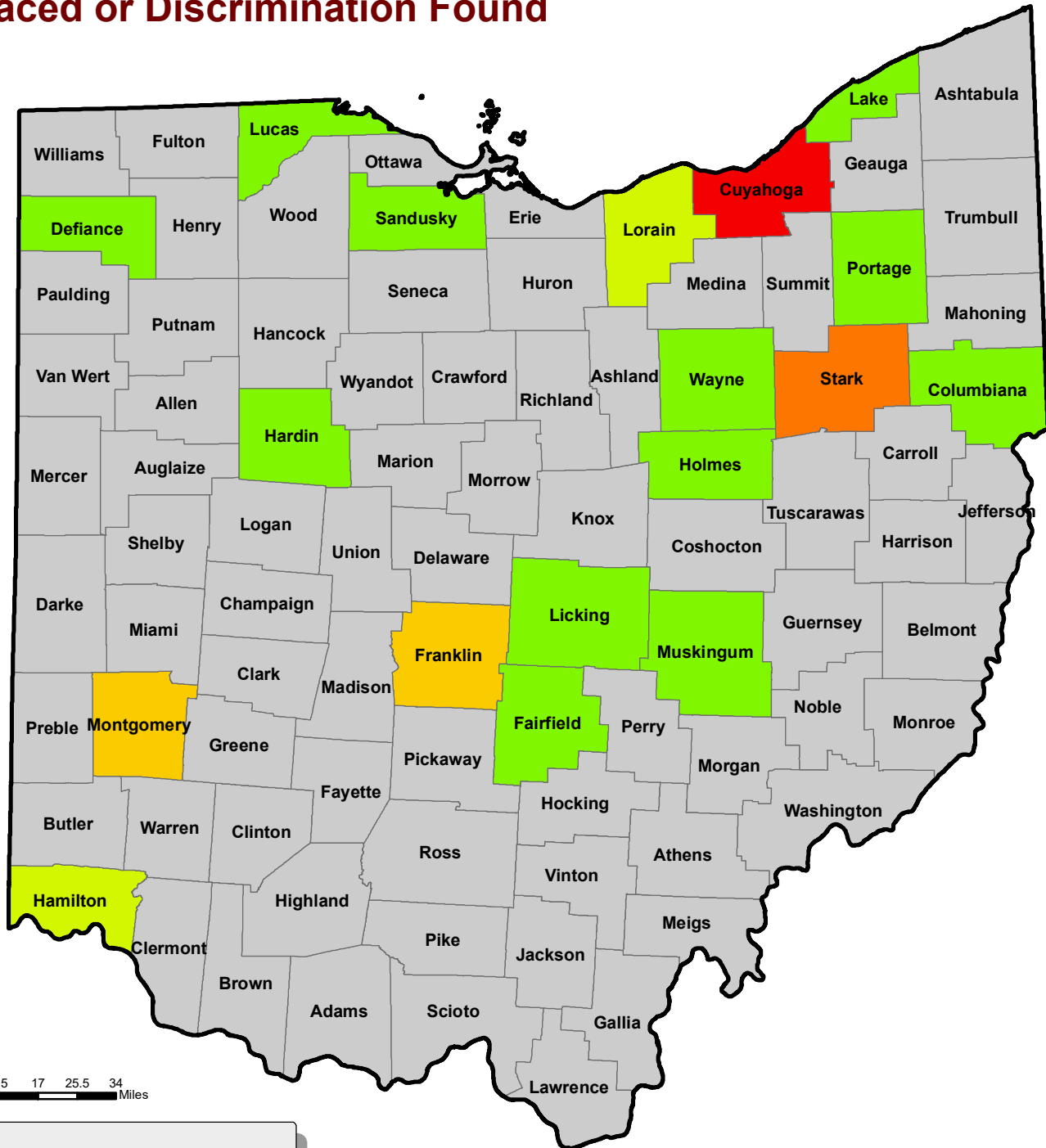
CY2015-2019 Discrimination by Retaliation Cases Reported with Conciliation/Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found



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0 4.258.5 17 25.5 34 Miles

Number of Cases by Retaliation

- Grey: No Cases
- Light Green: 1
- Yellow-Green: 2
- Yellow: 3
- Orange: 4 - 9
- Red: 10 - 15

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Office of Community Development

Date: 2/26/2020

Map 16

**Discrimination by Sex Cases
Reported with
Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

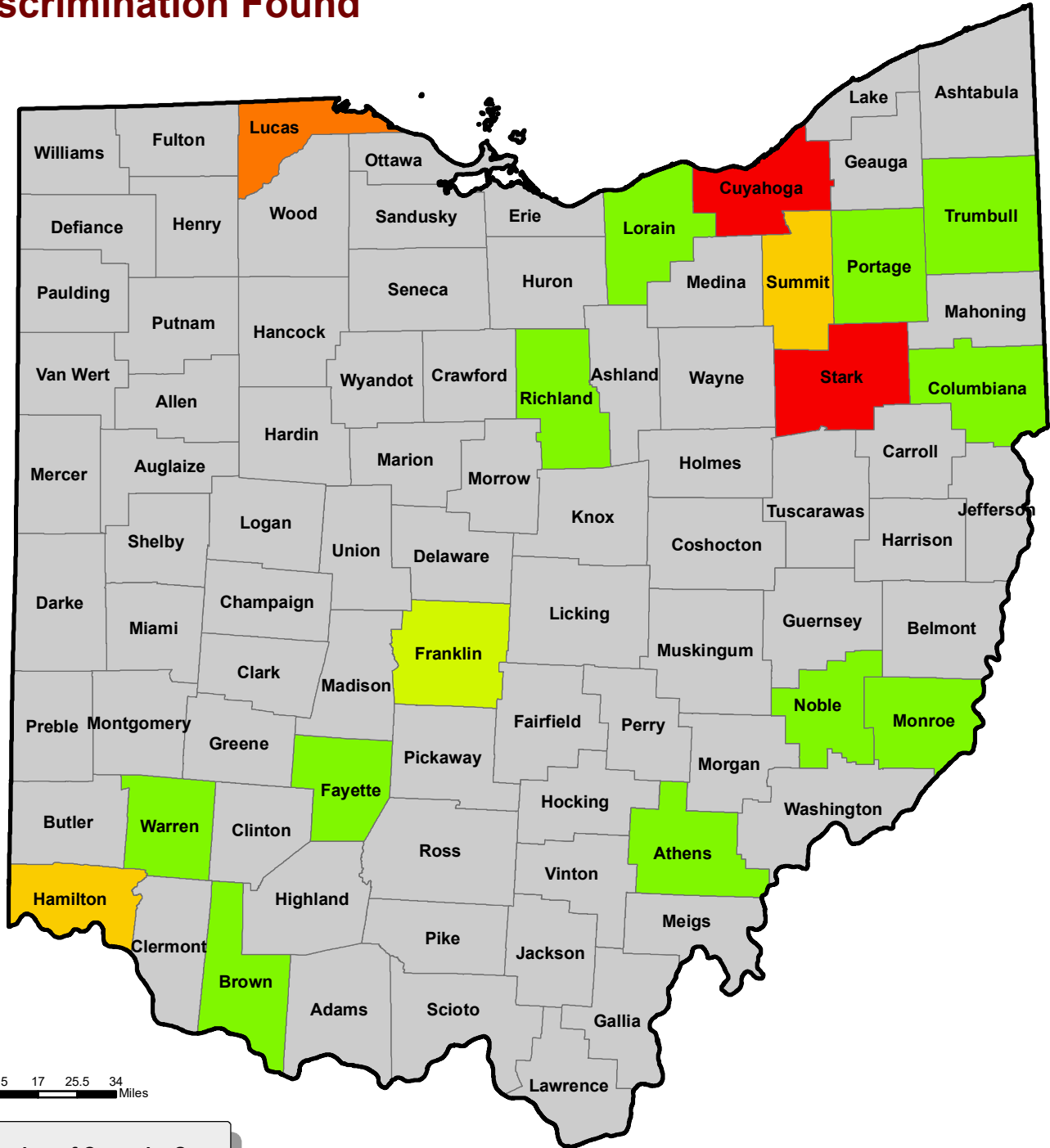
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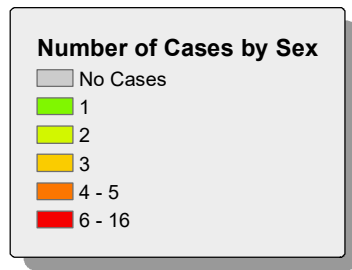
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0 4.258.5 17 25.5 34 Miles



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Date: 2/26/2020



Map 17

**Total Discrimination Cases Reported
with Conciliation/Settlement
Successful, FHAP Judicial Consent
Order Placed or Discrimination
Found**

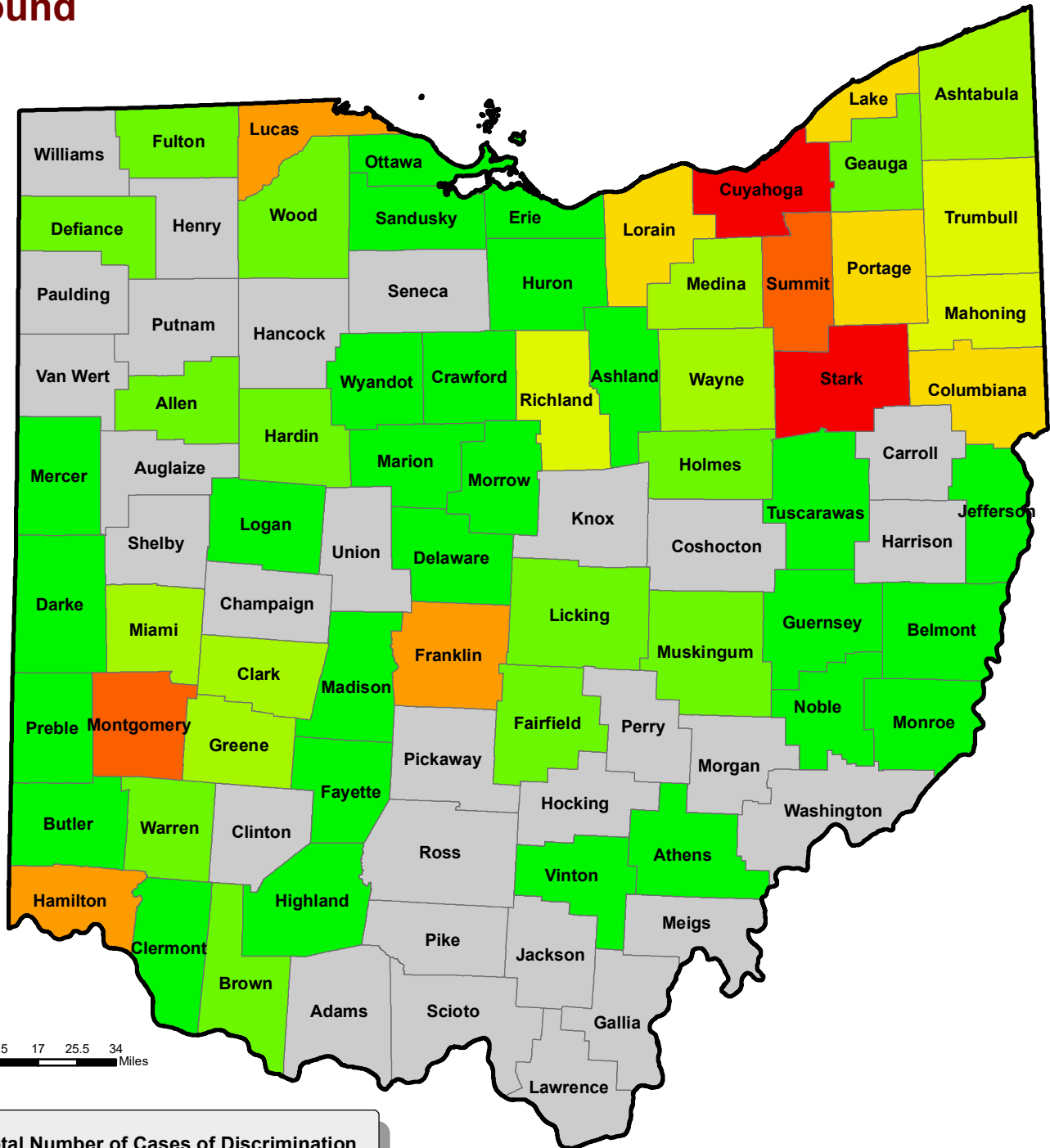
CY2015-2019 Total Cases Reported with Conciliation/Settlement Successful, FHAP Judicial Consent Order Placed or Discrimination Found



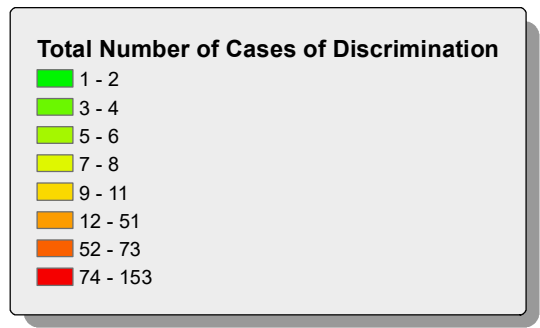
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0 4.258.5 17 25.5 34 Miles



Ohio Development Services Agency
Office of Community Development

Date: 2/26/2020



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Appendices



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Appendix 1

Ohio County Profiles: Ohio

Ohio County Profiles



Prepared by the Office of Research

Ohio

Established: March 1, 1803
2018 Population: 11,689,442
Land Area: 40,952.6 square miles
County Seat: Columbus City
Named for: Native American word meaning "beautiful river"



Taxes

Taxable value of real property	\$247,070,913,220
Residential	\$175,526,716,380
Agriculture	\$18,184,517,970
Industrial	\$10,194,415,040
Commercial	\$42,150,439,380
Mineral	\$1,014,824,450
Ohio income tax liability	\$7,357,616,906
Average per return	\$1,337.17

Land Use/Land Cover

	Percent
Developed, Lower Intensity	11.26%
Developed, Higher Intensity	2.49%
Barren (strip mines, gravel pits, etc.)	0.22%
Forest	32.42%
Shrub/Scrub and Grasslands	1.05%
Pasture/Hay	13.28%
Cultivated Crops	36.73%
Wetlands	1.51%
Open Water	1.05%

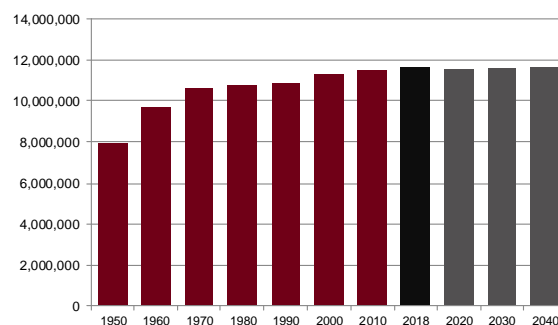
Largest Places

	Est. 2018	Census 2010
Columbus city, Franklin Co.	892,533	787,033
Cleveland city, Cuyahoga Co.	383,793	396,815
Cincinnati city, Hamilton Co.	302,605	296,943
Toledo city, Lucas Co.	274,975	287,208
Akron city, Summit Co.	198,006	199,110
Dayton city, Montgomery Co.	140,640	141,527
Parma city, Cuyahoga Co.	78,751	81,601
Canton city, Stark Co.	70,458	73,007
Youngstown city, Mahoning	64,958	66,982
Lorain city, Lorain Co.	64,028	64,097

UB: Unincorporated balance.

Total Population

Census		Estimated		Projected	
1800	42,159	1910	4,767,121	2013	11,576,576
1810	230,760	1920	5,759,394	2014	11,602,973
1820	581,434	1930	6,646,697	2015	11,617,850
1830	937,903	1940	6,907,612	2016	11,635,003
1840	1,519,467	1950	7,946,627	2017	11,664,129
1850	1,980,329	1960	9,706,397	2018	11,689,442
1860	2,339,511	1970	10,652,017		
1870	2,665,260	1980	10,797,630		
1880	3,198,062	1990	10,847,115	2020	11,574,870
1890	3,672,329	2000	11,353,140	2030	11,615,100
1900	4,157,545	2010	11,536,504	2040	11,679,010



Population by Race	Number	Percent
ACS Total Population	11,609,756	100.0%
White	9,503,779	81.9%
African-American	1,428,230	12.3%
Native American	21,872	0.2%
Asian	235,878	2.0%
Pacific Islander	3,499	0.0%
Other	103,726	0.9%
Two or More Races	312,772	2.7%
Hispanic (may be of any race)	414,490	3.6%
Total Minority	2,366,569	20.4%

Educational Attainment	Number	Percent
Persons 25 years and over	7,888,150	100.0%
No high school diploma	805,643	10.2%
High school graduate	2,646,608	33.6%
Some college, no degree	1,614,614	20.5%
Associate degree	672,658	8.5%
Bachelor's degree	1,341,204	17.0%
Master's degree or higher	807,423	10.2%

Family Type by Employment Status	Number	Percent
Total Families	2,945,785	100.0%
Married couple, husband and wife in labor force	1,125,772	38.2%
Married couple, husband in labor force, wife not	431,077	14.6%
Married couple, wife in labor force, husband not	179,004	6.1%
Married couple, husband and wife not in labor force	403,728	13.7%
Male householder, in labor force	165,197	5.6%
Male householder, not in labor force	51,643	1.8%
Female householder, in labor force	408,915	13.9%
Female householder, not in labor force	180,449	6.1%

Household Income	Number	Percent
Total Households	4,633,145	100.0%
Less than \$10,000	348,397	7.5%
\$10,000 to \$19,999	482,755	10.4%
\$20,000 to \$29,999	487,444	10.5%
\$30,000 to \$39,999	470,046	10.1%
\$40,000 to \$49,999	422,964	9.1%
\$50,000 to \$59,999	376,164	8.1%
\$60,000 to \$74,999	481,558	10.4%
\$75,000 to \$99,999	571,891	12.3%
\$100,000 to \$149,999	596,926	12.9%
\$150,000 to \$199,999	208,374	4.5%
\$200,000 or more	186,626	4.0%
Median household income	\$52,407	

Population by Age	Number	Percent
ACS Total Population	11,609,756	100.0%
Under 5 years	695,704	6.0%
5 to 17 years	1,931,464	16.6%
18 to 24 years	1,094,438	9.4%
25 to 44 years	2,880,343	24.8%
45 to 64 years	3,163,165	27.2%
65 years and more	1,844,642	15.9%
Median Age	39.3	

Family Type by Presence of Own Children Under 18	Number	Percent
Total Families	2,956,437	100.0%
Married-couple families with own children	793,310	26.8%
Male householder, no wife present, with own children	109,852	3.7%
Female householder, no husband present, with own children	333,458	11.3%
Families with no own children	1,719,817	58.2%

Poverty Status of Families By Family Type by Presence Of Related Children	Number	Percent
Total Families	2,956,437	100.0%
Family income above poverty level	2,637,125	89.2%
Family income below poverty level	319,312	10.8%
Married couple, with related children	53,595	16.8%
Male householder, no wife present, with related children	27,345	8.6%
Female householder, no husband present, with related children	166,752	52.2%
Families with no related children	71,620	22.4%

Ratio of Income To Poverty Level	Number	Percent
Population for whom poverty status is determined	11,289,161	100.0%
Below 50% of poverty level	776,037	6.9%
50% to 99% of poverty level	907,853	8.0%
100% to 124% of poverty level	492,184	4.4%
125% to 149% of poverty level	484,911	4.3%
150% to 184% of poverty level	716,283	6.3%
185% to 199% of poverty level	296,139	2.6%
200% of poverty level or more	7,615,754	67.5%

Geographical Mobility	Number	Percent
Population aged 1 year and older	11,477,267	100.0%
Same house as previous year	9,772,568	85.1%
Different house, same county	1,070,560	9.3%
Different county, same state	392,424	3.4%
Different state	195,629	1.7%
Abroad	46,086	0.4%

Percentages may not sum to 100% due to rounding.

Travel Time To Work

	Number	Percent
Workers 16 years and over	5,174,623	100.0%
Less than 15 minutes	1,495,954	28.9%
15 to 29 minutes	2,092,509	40.4%
30 to 44 minutes	1,002,382	19.4%
45 to 59 minutes	323,900	6.3%
60 minutes or more	259,878	5.0%

Mean travel time **23.4 minutes**

Housing Units

	Number	Percent
Total housing units	5,174,838	100.0%
Occupied housing units	4,633,145	89.5%
Owner occupied	3,060,473	66.1%
Renter occupied	1,572,672	33.9%
Vacant housing units	541,693	10.5%

Year Structure Built

	Number	Percent
Total housing units	5,174,838	100.0%
Built 2014 or later	25,334	0.5%
Built 2010 to 2013	70,257	1.4%
Built 2000 to 2009	507,339	9.8%
Built 1990 to 1999	613,226	11.9%
Built 1980 to 1989	466,116	9.0%
Built 1970 to 1979	737,431	14.3%
Built 1960 to 1969	632,437	12.2%
Built 1950 to 1959	736,327	14.2%
Built 1940 to 1949	325,052	6.3%
Built 1939 or earlier	1,061,319	20.5%

Median year built **1967**

Value for Specified Owner-Occupied Housing Units

	Number	Percent
Specified owner-occupied housing units	3,060,473	100.0%
Less than \$20,000	117,611	3.8%
\$20,000 to \$39,999	107,337	3.5%
\$40,000 to \$59,999	173,679	5.7%
\$60,000 to \$79,999	287,948	9.4%
\$80,000 to \$99,999	341,526	11.2%
\$100,000 to \$124,999	373,677	12.2%
\$125,000 to \$149,999	317,206	10.4%
\$150,000 to \$199,999	528,469	17.3%
\$200,000 to \$299,999	477,869	15.6%
\$300,000 to \$499,999	248,747	8.1%
\$500,000 to \$999,999	71,815	2.3%
\$1,000,000 or more	14,589	0.5%

Median value **\$135,100**

House Heating Fuel

	Number	Percent
Occupied housing units	4,633,145	100.0%
Utility gas	3,057,727	66.0%
Bottled, tank or LP gas	241,227	5.2%
Electricity	1,080,683	23.3%
Fuel oil, kerosene, etc	104,226	2.2%
Coal, coke or wood	92,112	2.0%
Solar energy or other fuel	37,610	0.8%
No fuel used	19,560	0.4%

Percentages may not sum to 100% due to rounding.

Gross Rent

	Number	Percent
Specified renter-occupied housing units	1,572,672	100.0%
Less than \$100	13,178	0.8%
\$100 to \$199	19,631	1.2%
\$200 to \$299	58,966	3.7%
\$300 to \$399	49,746	3.2%
\$400 to \$499	93,450	5.9%
\$500 to \$599	164,659	10.5%
\$600 to \$699	210,607	13.4%
\$700 to \$799	209,045	13.3%
\$800 to \$899	178,851	11.4%
\$900 to \$999	145,561	9.3%
\$1,000 to \$1,499	279,009	17.7%
\$1,500 or more	68,441	4.4%
No cash rent	81,528	5.2%

Median gross rent **\$764**

Median gross rent as a percentage of household income **28.6**

Selected Monthly Owner Costs for Specified Owner-Occupied Housing Units

	Number	Percent
Specified owner-occupied housing units with a mortgage	1,951,757	100.0%
Less than \$400	13,962	0.7%
\$400 to \$599	79,399	4.1%
\$600 to \$799	203,721	10.4%
\$800 to \$999	300,845	15.4%
\$1,000 to \$1,249	382,205	19.6%
\$1,250 to \$1,499	309,682	15.9%
\$1,500 to \$1,999	367,250	18.8%
\$2,000 to \$2,999	221,983	11.4%
\$3,000 or more	72,710	3.7%

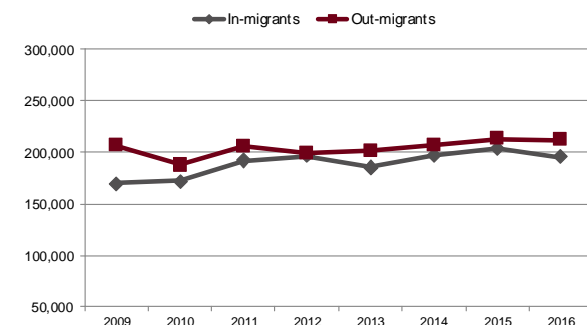
Median monthly owners cost **\$1,247**

Median monthly owners cost as a percentage of household income **19.9**

Vital Statistics

	Number	Rate
Births / rate per 1,000 women aged 15 to 44	136,621	62.0
Teen births / rate per 1,000 females 15-19	7,793	20.8
Deaths / rate per 100,000 population	123,650	1,065.4

Domestic Migration



Agriculture

Land in farms (acres)	13,965,295
Number of farms	77,805
Average size (acres)	179
Total cash receipts	\$9,341,225,000
Per farm	\$120,059
Receipts for crops	\$5,426,253,000
Receipts for livestock/products	\$3,914,972,000

Education

Traditional public schools buildings	3,095
Students	1,550,417
Teachers (Full Time Equivalent)	106,699.3
Expenditures per student	\$9,311
Graduation rate	90.7
Community/charter schools buildings	260
Students	92,328
Teachers (Full Time Equivalent)	6,843.8
Expenditures per student	\$7,362
Graduation rate	47.8
Private schools	707
Students	168,331
4-year public universities	13
Regional campuses	23
2-year public colleges/satellites	38
Ohio Technical Centers	53
Private universities and colleges	49
Public libraries (Districts / Facilities)	251 / 726

Transportation

Registered motor vehicles	12,581,177
Passenger cars	8,716,870
Noncommercial trucks	1,614,138
Total license revenue	\$329,296,667.03
Permissive tax revenue	\$179,858,625.60
Interstate highway miles	1,573.91
Turnpike miles	241.26
U.S. highway miles	3,917.20
State highway miles	13,982.91
County, township, and municipal road miles	102,346.08
Commercial airports	163

Health Care

Physicians	35,644
Registered hospitals	220
Number of beds	44,737
Licensed nursing homes	965
Number of beds	89,705
Licensed residential care	748
Number of beds	58,763
Persons with health insurance (Aged 0 to 64)	92.9%
Adults with insurance (Aged 18 to 64)	91.9%
Children with insurance (Aged Under 19)	95.4%

Communications

Television stations	61
Radio stations	347
Daily newspapers	78
Circulation	1,135,851
Average monthly unique visitors	29,718,718
Weekly newspapers	113
Circulation	790,134
Average monthly unique visitors	1,420,607
Online only	3
Average monthly unique visitors	113,135

Crime

Total crimes reported in Uniform Crime Report	293,813
Violent crime	32,872
Property crime	260,941

Finance

FDIC insured financial institutions (HQs)	185
Assets (000)	\$3,129,457,417
Branch offices	3,677
Institutions represented	219

Transfer Payments

Total transfer payments	\$106,869,302,000
Payments to individuals	\$104,066,223,000
Retirement and disability	\$37,195,123,000
Medical payments	\$50,890,728,000
Income maintenance (Supplemental SSI, family assistance, food stamps, etc)	\$9,123,749,000
Unemployment benefits	\$907,516,000
Veterans benefits	\$2,777,744,000
Federal education and training assistance	\$2,085,052,000
Other payments to individuals	\$1,086,311,000
Total personal income	\$544,828,473,000
Dependency ratio	19.6%
(Percent of income from transfer payments)	

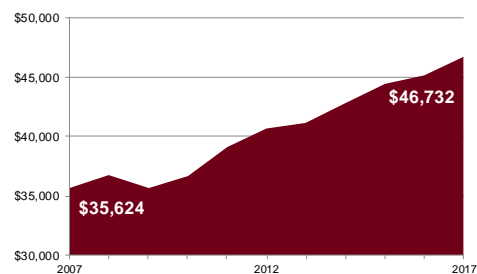
Voting

Number of registered voters	8,070,917
Voted in 2018 election	4,496,834
Percent turnout	55.7%

State Parks, Forests, Nature Preserves, Scenic Waterways, And Wildlife Areas

Areas/Facilities	596
Acreage	768,666

Per Capita Personal Income



Civilian Labor Force

	2018	2017	2016	2015	2014
Civilian labor force	5,755,000	5,770,000	5,739,000	5,697,000	5,704,000
Employed	5,492,000	5,483,000	5,451,000	5,417,000	5,373,000
Unemployed	263,000	263,000	288,000	280,000	331,000
Unemployment rate	4.6	5.0	5.0	4.9	5.8

Establishments, Employment, and Wages by Sector: 2017

Industrial Sector	Number of Establishments	Average Employment	Total Wages	Average Weekly Wage
Private Sector	281,556	4,646,754	\$225,700,415,798	\$934
Goods-Producing	40,913	930,920	\$55,709,106,283	\$1,151
Natural Resources and Mining	2,482	27,497	\$1,342,822,803	\$939
Constuction	23,005	216,958	\$13,198,736,328	\$1,170
Manufacturing	15,427	686,465	\$41,167,547,152	\$1,153
Service-Providing	240,644	3,715,835	\$169,991,309,515	\$880
Trade, Transportation and Utilities	68,746	1,018,107	\$43,345,054,719	\$819
Information	4,452	71,562	\$4,860,967,774	\$1,306
Financial Services	28,524	288,503	\$20,174,928,994	\$1,345
Professional and Business Services	52,626	724,577	\$45,222,259,303	\$1,200
Education and Health Services	34,078	897,275	\$40,674,360,111	\$872
Leisure and Hospitality	28,227	560,090	\$10,562,567,806	\$363
Other Services	23,598	155,241	\$5,126,233,780	\$635
Federal Government		78,329	\$5,934,136,425	\$1,457
State Government		131,520	\$8,590,567,441	\$1,256
Local Government		507,934	\$23,437,383,874	\$887

Private Sector total includes Unclassified establishments not shown.

Change Since 2012

Private Sector	3.1%	7.1%	19.3%	11.5%
Goods-Producing	-0.3%	7.8%	18.8%	10.2%
Natural Resources and Mining	13.1%	3.8%	3.7%	-0.1%
Construction	0.5%	19.9%	44.2%	20.2%
Manufacturing	-3.2%	4.6%	13.0%	8.0%
Service-Producing	3.7%	7.0%	19.5%	11.8%
Trade, Transportation and Utilities	1.9%	5.5%	17.2%	11.1%
Information	4.2%	-3.9%	8.4%	12.9%
Financial Services	4.8%	8.3%	28.4%	18.6%
Professional and Business Services	6.9%	7.8%	17.5%	9.0%
Education and Health Services	9.9%	6.6%	18.7%	11.4%
Leisure and Hospitality	3.4%	12.0%	29.6%	16.0%
Other Services	-3.0%	2.5%	26.4%	23.3%
Federal Government		0.1%	7.2%	7.1%
State Government		2.4%	16.4%	13.7%
Local Government		0.7%	9.9%	9.0%

Residential

Construction

	2014	2015	2016	2017	2018
Total units	19,872	20,047	22,816	23,917	24,221
Total valuation (000)	\$3,753,786	\$3,982,889	\$4,589,267	\$5,020,990	\$5,189,339
Total single-unit bldgs	12,535	13,529	15,221	16,153	16,329
Average cost per unit	\$244,523	\$247,503	\$250,668	\$254,041	\$265,885
Total multi-unit bldg units	7,337	6,518	7,595	7,764	7,892
Average cost per unit	\$93,865	\$97,333	\$101,889	\$118,169	\$107,412

Major & Notable Employers

Cardinal Health Inc	Trade
Ford Motor Co	Mfg
General Electric Co	Mfg
General Motors Corp	Mfg
Goodyear Tire & Rubber Co	Mfg
Honda Motor Company Ltd	Mfg
JP Morgan Chase	Fin
Kroger Co	Trade
L Brands, Inc	Trade
Macy's Inc	Trade
Nationwide Mutual Insurance Co	Ins
Procter & Gamble Co	Mfg
Wal-Mart Stores Inc	Trade
Whirlpool Corp	Mfg

Appendix 2

Ohio County Profiles: Appalachia

Ohio County Profiles



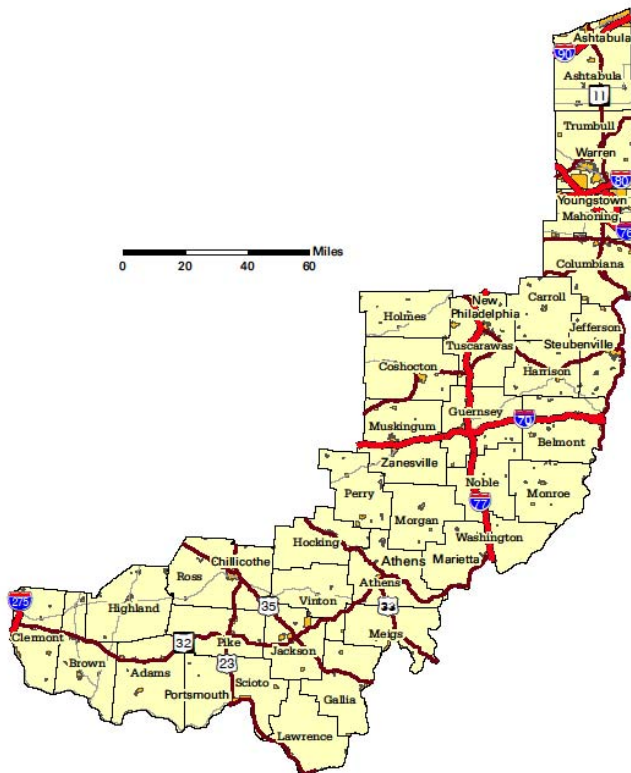
Prepared by the Office of Research

Appalachia

2018 Population: 1,993,819

Land Area: 16,011.5 square miles

In 1965, the U.S. Congress identified counties in thirteen states along the Appalachian Mountain Range as part of the Appalachian Regional Commission. In Ohio 32 counties were named. Their general location are along the Ohio River and the hill counties of Southeast Ohio.



Taxes

Taxable value of real property	\$35,484,709,130
Residential	\$23,082,568,230
Agriculture	\$5,179,462,200
Industrial	\$1,219,565,760
Commercial	\$5,014,118,560
Mineral	\$988,994,380
Ohio income tax liability	\$826,522,337
Average per return	\$967.92

Land Use/Land Cover

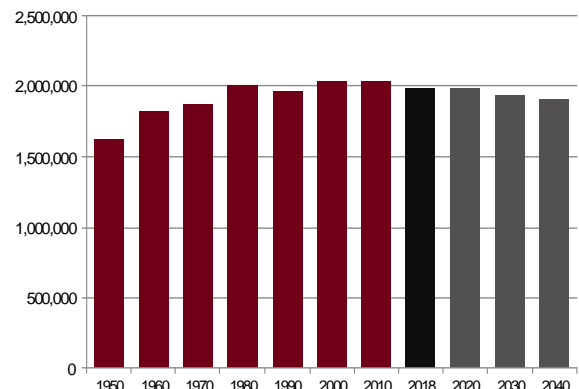
	Percent
Developed, Lower Intensity	7.65%
Developed, Higher Intensity	1.00%
Barren (strip mines, gravel pits, etc.)	0.24%
Forest	58.24%
Shrub/Scrub and Grasslands	1.82%
Pasture/Hay	19.65%
Cultivated Crops	8.95%
Wetlands	1.41%
Open Water	1.03%

Largest Places

	Est. 2018	Census 2010
Youngstown city, Maho. Co.	64,958	66,982
Union twp, Clermont Co.	48,258	46,416
Miami twp, Clermont Co.	42,554	40,848
Boardman twp UB, Maho. C	39,174	40,882
Warren city, Trumbull Co.	38,382	41,557
Austintown twp, Mahoning	35,191	36,722
Zanesville city, Muskingum	25,364	25,487
Athens city, Athens Co.	24,688	23,832
Chillicothe city, Ross Co.	21,698	21,901
Batavia twp UB, Clermont	20,810	20,106

Total Population

Census				Estimated	
1800	27,467	1910	1,245,494	2013	2,022,696
1810	121,079	1920	1,392,587	2014	2,017,222
1820	279,295	1930	1,503,078	2015	2,010,238
1830	423,379	1940	1,572,210	2016	2,003,848
1840	608,472	1950	1,629,217	2017	1,999,397
1850	747,405	1960	1,828,632	2018	1,993,819
1860	815,996	1970	1,871,900	Projected	
1870	875,713	1980	2,011,695	2020	1,987,620
1880	1,002,395	1990	1,965,333	2030	1,939,930
1890	1,058,762	2000	2,040,712	2040	1,906,850
1900	1,140,017	2010	2,042,040		



Population by Race

	Number	Percent
ACS Total Population	2,010,095	
White	1,858,945	
African-American	87,312	
Native American	4,174	
Asian	11,902	
Pacific Islander	397	
Other	6,707	
Two or More Races	40,658	
Hispanic (may be of any race)	39,172	
Total Minority	177,899	

Educational Attainment

	Number	Percent
Persons 25 years and over	1,390,810	100.0%
No high school diploma	180,822	13.0%
High school graduate	582,327	41.9%
Some college, no degree	262,560	18.9%
Associate degree	121,217	8.7%
Bachelor's degree	156,566	11.3%
Master's degree or higher	87,318	6.3%

Family Type by Employment Status

	Number	Percent
Total Families	524,645	100.0%
Married couple, husband and wife in labor force	179,166	34.1%
Married couple, husband in labor force, wife not	83,409	15.9%
Married couple, wife in labor force, husband not	37,800	7.2%
Married couple, husband and wife not in labor force	89,524	17.1%
Male householder, in labor force	27,113	5.2%
Male householder, not in labor force	12,210	2.3%
Female householder, in labor force	59,867	11.4%
Female householder, not in labor force	35,556	6.8%

Household Income

	Number	Percent
Total Households	793,340	100.0%
Less than \$10,000	67,049	8.5%
\$10,000 to \$19,999	99,268	12.5%
\$20,000 to \$29,999	94,666	11.9%
\$30,000 to \$39,999	87,169	11.0%
\$40,000 to \$49,999	77,940	9.8%
\$50,000 to \$59,999	65,253	8.2%
\$60,000 to \$74,999	83,937	10.6%
\$75,000 to \$99,999	93,189	11.7%
\$100,000 to \$149,999	83,240	10.5%
\$150,000 to \$199,999	23,647	3.0%
\$200,000 or more	17,982	2.3%
Median household income	\$46,023	

Percentages may not sum to 100% due to rounding.

Population by Age

	Number	Percent
ACS Total Population	2,010,095	100.0%
Under 5 years	111,909	5.6%
5 to 17 years	328,629	16.3%
18 to 24 years	178,747	8.9%
25 to 44 years	467,835	23.3%
45 to 64 years	567,321	28.2%
65 years and more	355,654	17.7%
Median Age	41.6	

Family Type by Presence of Own Children Under 18

	Number	Percent
Total Families	526,172	100.0%
Married-couple families with own children	132,094	25.1%
Male householder, no wife present, with own children	19,201	3.6%
Female householder, no husband present, with own children	51,058	9.7%
Families with no own children	323,819	61.5%

Poverty Status of Families By Family Type by Presence Of Related Children

	Number	Percent
Total Families	526,172	100.0%
Family income above poverty level	459,898	87.4%
Family income below poverty level	66,274	12.6%
Married couple, with related children	12,494	18.9%
Male householder, no wife present, with related children	6,008	9.1%
Female householder, no husband present, with related children	30,252	45.6%
Families with no related children	17,520	26.4%

Ratio of Income To Poverty Level

	Number	Percent
Population for whom poverty status is determined	1,946,033	100.0%
Below 50% of poverty level	149,183	7.7%
50% to 99% of poverty level	185,934	9.6%
100% to 124% of poverty level	98,259	5.0%
125% to 149% of poverty level	96,836	5.0%
150% to 184% of poverty level	140,450	7.2%
185% to 199% of poverty level	60,531	3.1%
200% of poverty level or more	1,214,840	62.4%

Geographical Mobility

	Number	Percent
Population aged 1 year and older	1,988,145	100.0%
Same house as previous year	1,741,127	87.6%
Different house, same county	148,937	7.5%
Different county, same state	64,409	3.2%
Different state	30,300	1.5%
Abroad	3,372	0.2%

Travel Time To Work

	Number	Percent
Workers 16 years and over	818,390	100.0%
Less than 15 minutes	250,906	30.7%
15 to 29 minutes	295,886	36.2%
30 to 44 minutes	143,664	17.6%
45 to 59 minutes	61,184	7.5%
60 minutes or more	66,750	8.2%

Mean travel time **minutes**

Housing Units

	Number	Percent
Total housing units	906,634	100.0%
Occupied housing units	793,340	87.5%
Owner occupied	565,774	71.3%
Renter occupied	227,566	28.7%
Vacant housing units	113,294	12.5%

Year Structure Built

	Number	Percent
Total housing units	906,634	100.0%
Built 2014 or later	4,029	0.4%
Built 2010 to 2013	12,719	1.4%
Built 2000 to 2009	88,629	9.8%
Built 1990 to 1999	117,365	12.9%
Built 1980 to 1989	86,430	9.5%
Built 1970 to 1979	136,890	15.1%
Built 1960 to 1969	97,158	10.7%
Built 1950 to 1959	115,077	12.7%
Built 1940 to 1949	54,698	6.0%
Built 1939 or earlier	193,639	21.4%

Median year built **1969**

Value for Specified Owner-Occupied Housing Units

	Number	Percent
Specified owner-occupied housing units	565,774	100.0%
Less than \$20,000	34,244	6.1%
\$20,000 to \$39,999	33,306	5.9%
\$40,000 to \$59,999	46,205	8.2%
\$60,000 to \$79,999	68,334	12.1%
\$80,000 to \$99,999	72,751	12.9%
\$100,000 to \$124,999	71,316	12.6%
\$125,000 to \$149,999	52,284	9.2%
\$150,000 to \$199,999	84,988	15.0%
\$200,000 to \$299,999	66,054	11.7%
\$300,000 to \$499,999	27,106	4.8%
\$500,000 to \$999,999	7,407	1.3%
\$1,000,000 or more	1,779	0.3%

Median value **\$109,832**

House Heating Fuel

	Number	Percent
Occupied housing units	793,340	100.0%
Utility gas	411,235	51.8%
Bottled, tank or LP gas	63,861	8.0%
Electricity	232,757	29.3%
Fuel oil, kerosene, etc	37,175	4.7%
Coal, coke or wood	35,684	4.5%
Solar energy or other fuel	8,324	1.0%
No fuel used	4,304	0.5%

Percentages may not sum to 100% due to rounding.

Gross Rent

	Number	Percent
Specified renter-occupied housing units	227,566	100.0%
Less than \$100	1,865	0.8%
\$100 to \$199	4,079	1.8%
\$200 to \$299	11,759	5.2%
\$300 to \$399	11,577	5.1%
\$400 to \$499	19,692	8.7%
\$500 to \$599	31,144	13.7%
\$600 to \$699	34,651	15.2%
\$700 to \$799	27,928	12.3%
\$800 to \$899	22,321	9.8%
\$900 to \$999	15,303	6.7%
\$1,000 to \$1,499	20,710	9.1%
\$1,500 or more	4,012	1.8%
No cash rent	22,525	9.9%

Median gross rent **\$662**

Selected Monthly Owner Costs for Specified Owner-Occupied Housing Units

	Number	Percent
Specified owner-occupied housing units with a mortgage	313,322	100.0%
Less than \$400	3,856	1.2%
\$400 to \$599	21,665	6.9%
\$600 to \$799	49,704	15.9%
\$800 to \$999	62,173	19.8%
\$1,000 to \$1,249	64,149	20.5%
\$1,250 to \$1,499	43,796	14.0%
\$1,500 to \$1,999	43,176	13.8%
\$2,000 to \$2,999	19,839	6.3%
\$3,000 or more	4,964	1.6%

Median monthly owners cost **\$1,075**

Vital Statistics

	Number	Rate
Births / rate per 1,000 women aged 15-44	22,005	63.0
Teen births / rate per 1,000 females 15-19	1,639	26.5
Deaths / rate per 100,000 population	24,217	1,205.2

Agriculture

Land in farms (acres)	3,975,857
Number of farms	27,896
Average size (acres)	143
Total cash receipts	\$1,499,445,000
Per farm	\$53,751
Receipts for crops	\$715,935,000
Receipts for livestock/products	\$783,512,000

Education

Traditional public schools buildings	644
Students	269,286
Teachers (Full Time Equivalent)	19,333.1
Expenditures per student	\$8,619
Graduation rate	91.3
Community/charter schools buildings	15
Students	3,487
Teachers (Full Time Equivalent)	435.5
Expenditures per student	\$7,875
Graduation rate	61.6
Private schools	80
Students	12,618
4-year public universities	3
Regional campuses	10
2-year public colleges/satellites	12
Ohio Technical Centers	17
Private universities and colleges	5
Public libraries (Districts / Facilities)	63 / 174

Transportation

Registered motor vehicles	2,406,315
Passenger cars	1,462,267
Noncommercial trucks	435,862
Total license revenue	\$65,503,091.54
Permissive tax revenue	\$21,255,400.00
Interstate highway miles	305.39
Turnpike miles	35.20
U.S. highway miles	1,141.60
State highway miles	5,627.75
County, township, and municipal road miles	31,729.01
Commercial airports	44

Health Care

Physicians	3,017
Registered hospitals	47
Number of beds	6,175
Licensed nursing homes	212
Number of beds	17,916
Licensed residential care	118
Number of beds	7,636
Persons with Health Insurance (Aged 0 to 64)	92.2%
Adults with insurance (Aged 18 to 64)	91.3%
Children with insurance (Aged Under 19)	94.6%

Communications

Television stations	8
Radio stations	87
Daily newspapers	20
Circulation	167,391
Average monthly unique visitors	1,382,003
Weekly newspapers	26
Circulation	129,950
Average monthly unique visitors	239,627
Online only	0
Average monthly unique visitors	0

Crime

Total crimes reported in Uniform Crime Report	34,860
Violent crime	2,771
Property crime	32,089

Finance

FDIC insured financial institutions (HQs)	53
Assets (000)	\$22,575,978
Branch offices	678
Institutions represented	82

Transfer Payments

Total transfer payments	\$20,937,696,000
Payments to individuals	\$20,453,328,000
Retirement and disability	\$7,103,077,000
Medical payments	\$10,287,364,000
Income maintenance (Supplemental SSI, family assistance, food stamps, etc)	\$1,777,628,000
Unemployment benefits	\$179,412,000
Veterans benefits	\$595,209,000
Federal education and training assistance	\$334,156,000
Other payments to individuals	\$176,482,000
Total personal income	\$77,745,238,000
Dependency ratio	26.9%
(Percent of income from transfer payments)	

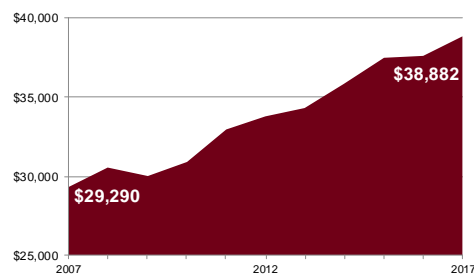
Voting

Number of registered voters	1,339,951
Voted in 2018 election	716,833
Percent turnout	53.5%

State Parks, Forests, Nature Preserves, Scenic Waterways, And Wildlife Areas

Areas/Facilities	229
Acreage	562,468

Per Capita Personal Income



Civilian Labor Force

	2018	2017	2016	2015	2014
Civilian labor force	888,700	895,800	900,500	902,800	910,200
Employed	840,000	841,600	843,000	848,400	847,400
Unemployed	48,300	48,300	57,300	54,700	62,300
Unemployment rate	5.4	5.4	6.4	6.1	6.8

Establishments, Employment, and Wages by Sector: 2017

Industrial Sector	Number of Establishments	Average Employment	Total Wages	Average Weekly Wage
Some numbers are underreported due to suppression at the county level.				
Private Sector	38,920	537,066	\$20,681,085,178	\$741
Goods-Producing	7,148	124,022	\$6,679,374,036	\$1,036
Natural Resources and Mining	735	5,631	\$300,470,172	\$1,026
Constuction	3,984	29,812	\$1,652,931,662	\$1,066
Manufacturing	2,431	84,812	\$4,467,342,916	\$1,013
Service-Providing	31,774	413,043	\$14,001,711,142	\$652
Trade, Transportation and Utilities	9,919	132,947	\$4,650,688,905	\$673
Information	461	5,083	\$226,956,294	\$859
Financial Services	3,596	21,344	\$998,365,940	\$900
Professional and Business Services	5,022	48,923	\$2,119,240,733	\$833
Education and Health Services	5,244	113,900	\$4,389,602,562	\$741
Leisure and Hospitality	4,122	71,207	\$1,027,621,979	\$278
Other Services	3,402	15,841	\$396,925,680	\$482
Federal Government		7,126	\$434,989,070	\$1,174
State Government		12,605	\$692,042,743	\$1,056
Local Government		79,853	\$3,100,625,538	\$747

Private Sector total includes Unclassified establishments not shown.

Change Since 2012

Private Sector	1.2%	2.5%	14.3%	11.6%
Goods-Producing	2.1%	0.4%	11.2%	10.8%
Natural Resources and Mining	10.7%	-18.2%	-21.9%	-4.6%
Construction	3.2%	24.8%	49.7%	19.9%
Manufacturing	-2.2%	-3.5%	4.4%	8.2%
Service-Producing	1.0%	3.2%	15.8%	12.3%
Trade, Transportation and Utilities	0.6%	2.7%	13.4%	10.4%
Information	-4.0%	-26.2%	-27.4%	-1.5%
Financial Services	2.8%	-3.2%	14.4%	18.2%
Professional and Business Services	3.3%	1.9%	23.0%	20.6%
Education and Health Services	9.9%	3.3%	14.2%	10.5%
Leisure and Hospitality	-1.1%	9.2%	23.1%	13.0%
Other Services	-10.0%	-12.9%	2.5%	17.8%
Federal Government		0.0%	4.6%	4.7%
State Government		-26.7%	-20.8%	8.1%
Local Government		-4.0%	3.9%	8.3%

Residential Construction

	2014	2015	2016	2017	2018
Total units	1,526	1,686	1,784	2,024	1,675
Total valuation (000)	\$234,834	\$270,089	\$281,882	\$325,078	\$321,852
Total single-unit bldgs	1,066	1,102	1,229	1,393	1,373
Average cost per unit	\$186,287	\$195,518	\$203,095	\$199,961	\$213,191
Total multi-unit bldg units	460	584	555	631	302
Average cost per unit	\$78,809	\$93,542	\$58,158	\$73,743	\$96,493

Major & Notable Employers

American Electric Power	Utility
Bellisio Foods Inc	Mfg
Fluor-BWXT Portsmouth/USEC	Govt
General Mills Inc	Mfg
Kennametal Inc	Mfg
Kenworth Truck Co/PACCAR	Mfg
Ohio University	Govt
Youngstown State University	Govt



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Appendix 3

Population Projections

**OHIO DEVELOPMENT SERVICES AGENCY
POPULATION PROJECTIONS: COUNTY TOTALS**

	2010	2015	2020	2025	2030	2035	2040
	Census	Projection	Projection	Projection	Projection	Projection	Projection
Ohio	11,536,504	11,549,120	11,574,870	11,598,670	11,615,100	11,635,110	11,679,010
Adams	28,550	28,410	28,380	28,210	28,100	27,780	27,520
Allen	106,331	104,790	103,560	102,420	101,450	100,850	100,650
Ashland	53,139	53,620	53,980	54,870	55,790	57,010	57,920
Ashtabula	101,497	97,810	95,160	92,510	89,760	87,040	84,510
Athens	64,757	65,990	66,720	66,710	66,320	65,630	64,830
Auglaize	45,949	45,780	45,590	45,150	44,690	44,270	44,430
Belmont	70,400	69,760	68,880	68,270	67,330	66,530	66,140
Brown	44,846	43,700	42,350	41,100	40,070	39,280	38,700
Butler	368,130	378,370	390,110	399,880	410,960	419,900	430,360
Carroll	28,836	27,450	26,530	25,650	24,880	24,080	23,390
Champaign	40,097	38,950	38,090	37,450	36,840	36,360	35,890
Clark	138,333	135,490	133,240	131,390	129,900	128,840	128,580
Clermont	197,363	203,650	208,330	212,110	214,090	215,560	216,190
Clinton	42,040	42,160	42,100	42,060	41,590	41,150	40,380
Columbiana	107,841	106,660	105,380	104,370	103,870	103,890	104,710
Coshocton	36,901	36,650	36,190	35,660	34,790	34,070	33,390
Crawford	43,784	42,300	40,890	39,500	38,150	36,840	35,530
Cuyahoga	1,280,122	1,242,380	1,209,550	1,179,030	1,154,210	1,131,380	1,113,950
Darke	52,959	52,190	51,270	49,670	48,280	46,890	46,280
Defiance	39,037	38,590	38,090	37,200	36,490	36,060	35,890
Delaware	174,214	192,990	210,630	227,930	246,000	264,100	282,160
Erie	77,079	75,070	72,900	70,350	67,740	64,910	62,300
Fairfield	146,156	150,960	157,040	163,300	170,630	178,340	186,810
Fayette	29,030	28,880	28,860	28,780	28,750	28,740	28,880
Franklin	1,163,414	1,227,560	1,291,320	1,348,980	1,394,980	1,439,060	1,483,160
Fulton	42,698	42,350	42,200	41,500	40,740	40,290	40,310
Gallia	30,934	29,900	29,010	28,150	27,510	26,950	26,600
Geauga	93,389	93,650	93,510	94,270	94,930	95,400	94,710
Greene	161,573	163,500	164,940	165,950	165,780	164,830	163,300
Guernsey	40,087	39,480	38,750	38,000	37,310	36,680	36,390
Hamilton	802,374	793,980	790,600	788,420	785,900	784,560	786,090
Hancock	74,782	75,130	75,330	75,620	75,140	74,670	73,500
Hardin	32,058	31,850	31,740	31,490	31,360	31,140	31,110
Harrison	15,864	15,660	15,300	15,210	15,100	15,050	15,100
Henry	28,215	27,690	27,230	26,760	26,360	26,010	25,810
Highland	43,589	42,990	41,840	41,530	41,150	41,340	41,740
Hocking	29,380	28,470	27,550	26,600	26,020	25,260	24,680
Holmes	42,366	43,610	44,620	45,230	45,700	45,620	45,280
Huron	59,626	59,360	58,740	57,860	56,950	56,090	55,500
Jackson	33,225	32,370	31,600	30,940	30,670	30,520	30,630
Jefferson	69,709	67,780	66,540	65,580	65,330	65,820	67,410
Knox	60,921	60,660	60,270	60,200	60,650	61,650	63,750
Lake	230,041	229,530	228,600	228,320	228,380	228,550	228,060
Lawrence	62,450	60,400	59,100	57,820	57,070	56,770	57,050
Licking	166,492	173,520	180,860	188,810	196,570	204,220	212,370
Logan	45,858	45,810	45,600	45,210	44,590	43,930	43,590
Lorain	301,356	306,400	310,230	315,760	320,430	325,550	328,190
Lucas	441,815	435,300	430,450	425,620	420,080	414,630	410,570
Madison	43,435	44,510	45,670	46,510	47,420	48,000	48,700
Mahoning	238,823	231,210	224,680	218,320	212,240	206,740	202,630

**OHIO DEVELOPMENT SERVICES AGENCY
POPULATION PROJECTIONS: COUNTY TOTALS**

	2010	2015	2020	2025	2030	2035	2040
	Census	Projection	Projection	Projection	Projection	Projection	Projection
Marion	66,501	64,540	63,840	63,110	62,400	61,840	61,910
Medina	172,332	179,200	184,670	190,430	194,510	198,220	199,890
Meigs	23,770	23,610	23,630	23,300	23,170	22,670	22,340
Mercer	40,814	40,960	41,040	41,240	41,230	41,130	40,960
Miami	102,506	102,700	102,590	103,160	103,500	103,930	103,990
Monroe	14,642	14,420	14,160	13,900	13,590	13,290	13,120
Montgomery	535,153	524,370	513,830	504,770	496,650	491,080	489,390
Morgan	15,054	14,880	14,770	14,600	14,360	14,100	13,820
Morrow	34,827	34,940	34,870	34,690	34,540	34,420	34,260
Muskingum	86,074	85,790	85,420	84,870	83,900	82,810	81,900
Noble	14,645	14,190	13,960	13,830	13,790	13,750	13,920
Ottawa	41,428	40,860	40,100	39,420	38,720	37,780	36,880
Paulding	19,614	19,270	19,050	18,570	18,220	17,950	18,100
Perry	36,058	35,430	35,210	35,010	34,840	34,830	34,980
Pickaway	55,698	56,690	58,010	59,120	60,560	61,740	63,100
Pike	28,709	28,610	29,000	29,010	29,420	29,420	29,970
Portage	161,419	161,500	161,410	160,780	158,930	155,740	151,720
Preble	42,270	41,180	40,420	39,070	37,540	35,800	34,140
Putnam	34,499	34,550	34,430	34,180	33,860	33,700	33,860
Richland	124,475	122,180	120,200	118,190	116,640	115,410	115,160
Ross	78,064	76,880	76,000	75,710	76,010	76,260	76,570
Sandusky	60,944	59,960	58,670	57,040	55,440	53,910	52,640
Scioto	79,499	76,050	73,730	71,550	69,720	68,280	67,290
Seneca	56,745	56,030	55,050	54,030	53,040	52,190	51,560
Shelby	49,423	49,450	49,290	48,780	48,240	47,570	47,160
Stark	375,586	371,650	368,210	364,650	361,130	357,820	355,500
Summit	541,781	537,220	534,150	532,080	528,990	525,600	523,190
Trumbull	210,312	205,150	200,840	197,080	193,360	189,810	187,250
Tuscarawas	92,582	92,520	92,310	92,060	91,890	92,190	92,840
Union	52,300	54,140	57,710	61,050	64,830	69,420	73,800
Van Wert	28,744	28,180	27,620	26,810	26,190	25,830	25,900
Vinton	13,435	13,100	12,680	12,470	12,350	12,320	12,240
Warren	212,693	220,430	225,770	231,230	235,640	239,040	239,060
Washington	61,778	60,410	59,000	57,620	56,220	54,930	53,720
Wayne	114,520	114,530	114,390	113,920	113,400	113,000	113,240
Williams	37,642	36,890	36,070	35,040	34,150	33,450	33,280
Wood	125,488	129,320	130,870	132,710	134,280	134,800	134,920
Wyandot	22,615	22,330	21,960	21,530	21,000	20,490	20,080

Prepared by: Office of Research

April 2018

Note: Counties do not sum to state total due to rounding



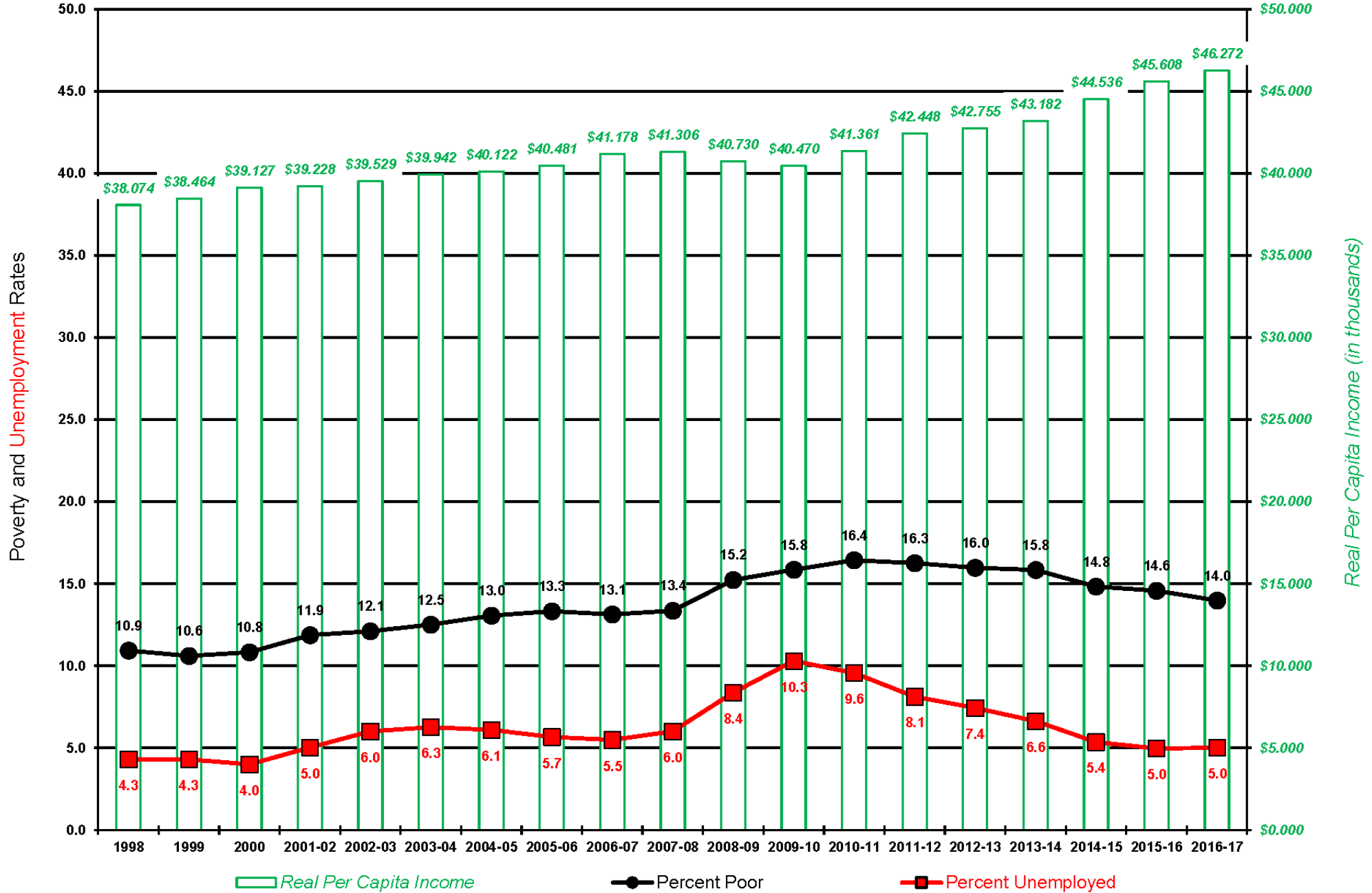
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Appendix 4

Ohio's Poverty Rate, Unemployment Rate and Real Per Capita Income, 1998-2017

Ohio's Poverty and Unemployment Rates and Real Per Capita Income, 1998-2017

(Income Standardized on 2017, Figures for Hyphenated Years Are Averages of the Components)



Sources: U.S. Bureau of the Census, Economic Analysis, and Labor Statistics, ODJFS/LMI

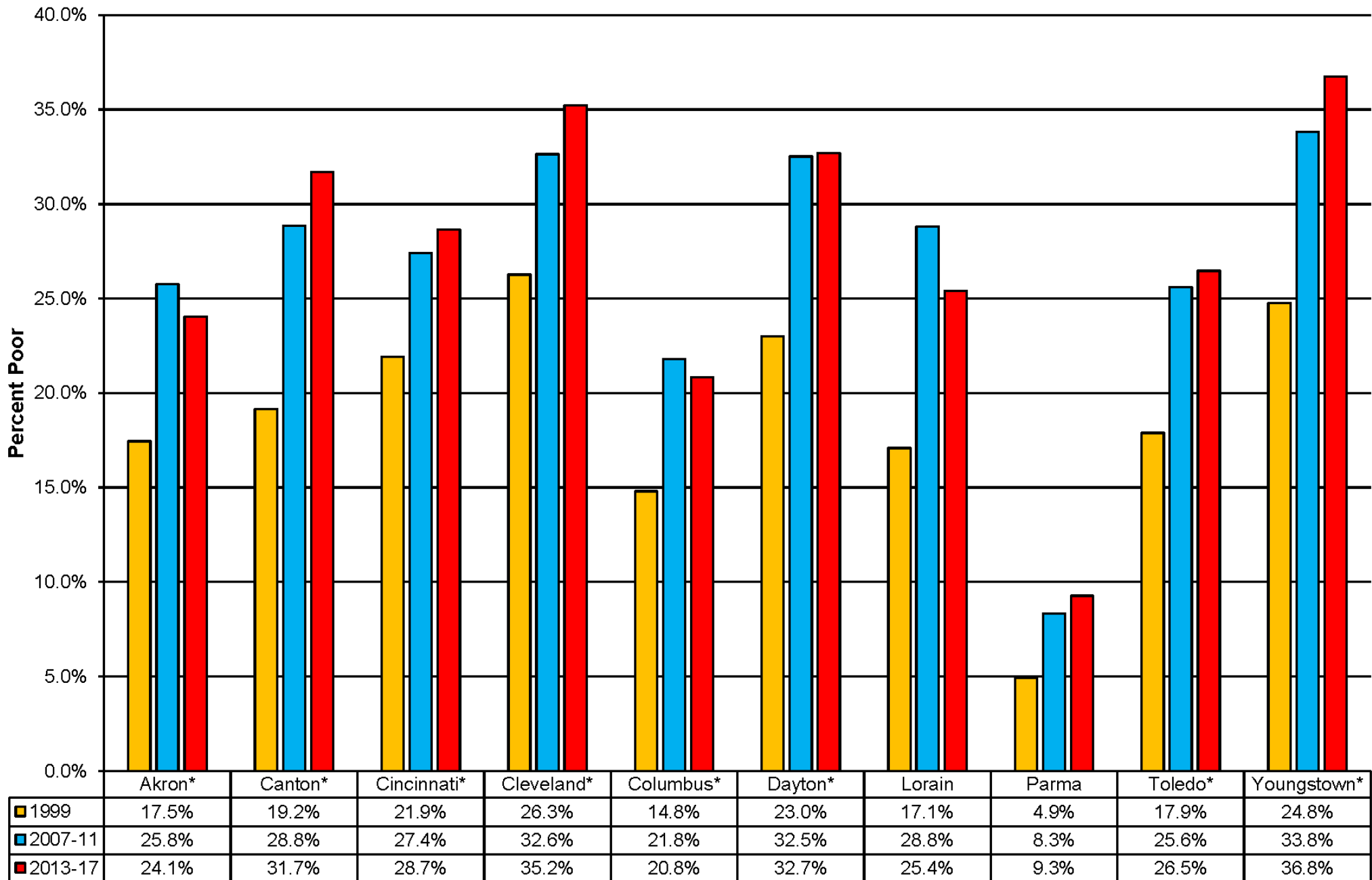


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Appendix 5

Changing Poverty Rates in Ohio's 10 Largest Cities: 1999, 2007-2011 and 2013-2017

Changing Poverty Rates in Ohio's 10 Largest Cities 1999, 2007-2011 and 2013-2017





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Appendix 6

Ohio's Top Employers

Rank	Company	Ohio Employment Estimate: Headcount	Headquarters Location	Sector
1	Cleveland Clinic Foundation	50,825	Cleveland, OH	Health
2	Wal-Mart Stores, Inc.	49,330	Bentonville, AR	Retail: General Merchandise
3	Kroger Co..	45,340	Cincinnati, OH	Retail: Food Stores
4	Ohio State University and Medical Center	34,470	Columbus, OH	Education and Health
5	Bon Secours Mercy Health, Inc	31,500	Cincinnati, OH	Health
6	University Hospitals Health System, Inc.	28,000	Shaker Heights, OH	Health
6	Wright-Patterson Air Force Base ¹	28,000	Dayton, OH	Government: Air Force base
8	OhioHealth	26,600	Columbus, OH	Health
9	ProMedica Health System	22,500	Toledo, OH	Health
10	JPMorgan Chase & Co.	21,000	New York, NY	Finance: Bank
11	Giant Eagle, Inc.	19,000	Pittsburgh, PA	Retail: Food Stores
12	Cincinnati Children's Hospital Medical Center	15,660	Cincinnati, OH	Health
13	Honda Motor Co., Ltd.	15,000	Tokyo, Japan	Manufacture: Motor Vehicles
14	Golden Gate Capital LP / Bob Evans Restaurant	14,500	San Francisco, CA	Hospitality: Restaurants
15	United Parcel Service, Inc.	14,425	Atlanta, GA	Transportation: Air Delivery
16	Nationwide Mutual Insurance Company	14,000	Columbus, OH	Finance: Insurance
16	Premier Health Partners	14,000	Dayton, OH	Health
18	Lowe's Companies, Inc.	13,400	Mooresville, NC	Retail: Home Improvement
19	TriHealth, Inc.	12,500	Cincinnati, OH	Health
20	Home Depot, Inc.	12,350	Atlanta, GA	Retail: Home Improvement
21	General Electric Company	12,000	Boston, MA	Manufacture: Aerospace / Electrical Eqpt.
21	Kettering Health Network	12,000	Kettering, OH	Health
21	Nationwide Children's Hospital	12,000	Columbus, OH	Health
24	Berkshire Hathaway, Inc.	11,800	Omaha, NE	Manufacture / Service / Finance
25	Amazon.com, Inc.	11,500	Seattle, WA	Retail: General Merchandise
26	Procter & Gamble Company	11,000	Cincinnati, OH	Manufacture: Soaps & Consumer Goods
26	Progressive Corporation	11,000	Mayfield Village, OH	Finance: Insurance
26	UC Health	11,000	Cincinnati, OH	Health
29	Meijer, Inc.	10,900	Grand Rapids, MI	Retail: General Merchandise
30	University of Cincinnati	10,800	Cincinnati, OH	Education
31	Huntington Bancshares Incorporated	10,600	Columbus, OH	Finance: Bank
32	Cedar Fair, L.P.	10,500	Sandusky, OH	Entertainment: Theme Parks
33	L Brands, Inc.	10,300	Columbus, OH	Retail: Clothing
34	Whirlpool Corporation	9,350	Benton Harbor, MI	Manufacture: Consumer Products
35	Marathon Petroleum Corporation	9,350	Findlay, OH	Retail: Gas Stations
36	CVS Health Corporation	8,800	Woonsocket, RI	Retail: Drug Stores
36	Fifth Third Bancorp	8,800	Cincinnati, OH	Finance: Bank
38	Trinity Health Corporation / Mount Carmel Health	8,700	Livonia, MI	Health
39	Target Corporation	8,600	Minneapolis, MN	Retail: Department Stores
40	Dollar Tree, Inc.	8,200	Chesapeake, VA	Retail: General Merchandise
40	Kohl's Corporation	8,200	Menomonee Falls, WI	Retail: Department Stores
42	Charter Communications, Inc./Spectrum Management Holding Company, LLC	7,930	Stamford, CT	Service: Cable TV

43	MetroHealth System	7,700	Cleveland, OH	Health
44	Covelli Enterprises, Inc.	7,000	Warren, OH	Hospitality: Restaurants
44	Dollar General Corporation	7,000	Goodlettsville, TN	Retail: General Merchandise
44	FirstEnergy Corp.	7,000	Akron, OH	Utility: Electricity
44	PNC Financial Services Group, Inc.	7,000	Pittsburgh, PA	Finance: Bank
44	Summa Health System	7,000	Akron, OH	Health
49	AT&T Inc.	6,900	Dallas, TX	Utility: Telecommunications
49	Aultman Health Foundation	6,900	Canton, OH	Health
51	Cardinal Health, Inc.	6,700	Dublin, OH	Wholesale: Pharmaceuticals
52	Fiat Chrysler Automobiles N.V.	6,530	Onbekend, The Netherlands	Manufacture: Motor Vehicles
53	Marc Glassman, Inc.	6,500	Parma, OH	Retail: General Merchandise
54	KeyCorp	6,400	Cleveland, OH	Finance: Bank
55	Christ Hospital Corporation	6,250	Cincinnati, OH	Health
56	Macy's, Inc.	6,200	Cincinnati, OH	Retail: Department Stores
57	Ford Motor Company	6,150	Dearborn, MI	Manufacture: Motor Vehicles
58	University of Toledo	6,140	Toledo, OH	Education
59	Sherwin-Williams Company	6,100	Cleveland, OH	Manufacture: Paints
60	Walgreens Boots Alliance, Inc.	6,060	Deerfield, IL	Retail: Drug Stores
61	American Electric Power Company, Inc.	6,000	Columbus, OH	Utility: Electricity
61	TJX Companies Inc	6,000	Framingham, MA	Retail: Clothing
63	Kent State University	5,600	Kent, OH	Education
64	NRD Capital Management, LLC/Frisch's Restaurants, Inc.	5,350	Brookhaven, GA	Hospitality: Restaurants
65	U.S. Bancorp	5,300	Minneapolis, MN	Finance: Bank
66	Ohio University	5,100	Athens, OH	Education
67	Akron Children's Hospital	4,970	Akron, OH	Health
68	Alliance Data Systems Corporation	4,800	Plano, TX	Finance
68	Crown Equipment Corporation	4,800	New Bremen, OH	Manufacture: Lift Trucks
70	Case Western Reserve University	4,750	Cleveland, OH	Education
71	Swagelok Company	4,700	Solon, OH	Manufacture: Fluid Systems
72	General Motors Corporation	4,600	Detroit, MI	Manufacture: Motor Vehicles
73	Starbucks Corporation	4,400	Seattle, WA	Hospitality: Restaurants
74	Rite Aid Corporation	4,300	Camp Hill, PA	Retail: Drug Stores
75	Miami University	4,250	Oxford, OH	Education
76	FedEx Corporation	4,200	Memphis, TN	Transportation: Air Delivery
77	Discount Drug Mart, Inc.	4,100	Medina, OH	Retail: Drug Stores
77	J. C. Penney Corporation, Inc.	4,100	Plano, TX	Retail: Department Stores
79	Deutsche Post AG / DHL Supply Chain	4,000	Bonn, Germany	Transportation: Logistics
79	EssilorLuxottica	4,000	Charenton-le-Pont, France	Retail: Optical Goods
79	Securitas AB	4,000	Stockholm, Sweden	Service: Security
82	Verizon Communications Inc.	3,800	New York, NY	Utility: Telecommunications
83	Norfolk Southern Corporation	3,730	Norfolk, VA	Transportation: Railroad
84	Anthem, Inc.	3,700	Indianapolis, IN	Health: Insurance
84	Menard, Inc.	3,700	Eau Claire, WI	Retail: Home Improvement
86	Big Lots, Inc.	3,600	Columbus, OH	Retail: General Merchandise
86	Cintas Corporation	3,600	Mason, OH	Service: Uniforms

86 Nestlé S.A.
 89 Worthington Industries, Inc.
 90 AK Steel Holding Corporation
 90 UnitedHealth Group Incorporated
 92 Cincinnati Financial Corp.
 93 Goodyear Tire & Rubber Company
 94 Abercrombie & Fitch Co.
 95 NASA Glenn Research Center¹
 96 ArcelorMittal SA
 96 Emerson Electric Co.
 96 Signet Jewelers Limited / Sterling Jewelers, Inc.
 99 University of Akron
 100 Cincinnati Bell Inc.
 100 Honeywell International Inc.
 100 Lake Hospital System, Inc.
 100 RELX PLC / LexisNexis Group

¹ includes civilian private contractors and military on base

3,600	Vevey, Switzerland	Manufacture: Frozen Foods
3,570	Worthington, OH	Manufacture: Metal Products
3,500	West Chester, OH	Manufacture: Steel
3,500	Minnetonka, MN	Health: Insurance
3,350	Fairfield, OH	Finance: Insurance
3,300	Akron, OH	Manufacture: Rubber Products
3,250	New Albany, OH	Retail: Clothing
3,135	Cleveland, OH	Government: Aerospace / Defense
3,100	Luxembourg, Luxembourg	Manufacture: Steel
3,100	St Louis, MO	Manufacture: Electrical Products
3,100	Hamilton, Bermuda	Retail: Jewelry
3,050	Akron, OH	Education
3,000	Cincinnati, OH	Utility: Telecommunications
3,000	Morris Plains, NJ	Manufacture: Aerospace / Electrical Eqpt.
3,000	Painesville, OH	Health
3,000	London, UK	Service: Information Retrieval



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Appendix 7

History of Civil Rights in Ohio

History of Civil Rights in Ohio⁴	
Year	Event
1787	Northwest Ordinance (capital in Marietta, OH) declares slavery to not be permitted in Northwest Territory
1803	Ohio Constitution outlaws slavery
1835	Oberlin College admits black students
1851	Ohio Constitution Adopted- Denied the right to vote to women and African Americans
1865	Thirteenth Amendment (US) ended slavery
1867	Fourteenth Amendment (US) granted equal protection under the law
1870	Fifteenth Amendment (US) gave African American men the right to vote
1884	Ohio passes the Ohio Public Accommodations Law, eliminating inequity in public facilities
1894	Ohio's first black State Senator elected
	Ohio Civil Rights Law passed to guarantee equal access to any public place
1923	Ohio decides to eliminate race as a criterion for voting
1949	American Housing Act of 1949
1959	Ohio Civil Rights Act passed
	Ohio Civil Rights Commission established
1965	Ohio's Laws Against Discrimination include housing discrimination
1967	Cleveland, OH elects first African American mayor
1970	Dayton, OH elects first African American mayor
1973	Ohio prohibits discrimination based on sex
1976	Ohio's Laws Against Discrimination include issuance of credit
1984	Ohio prohibits discrimination, based on handicap, in post-secondary institutions
1988	Ohio Civil Rights Commission signs work share agreement with HUD
2008	Ohio adds military status as protected class under civil rights laws

⁴The History of Fair Housing As a Civil Right In the State of Ohio." *Ohio Development Services Agency*.Ohio State Legal Services Association.Web. 21 Apr. 2015.



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Appendix 8

Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law

Protected Classes - Federal Fair Housing Act and Ohio Fair Housing Law

Class	Federal Law	State Law	Differences
Disability (state)/ Handicapped (federal)	(1) a physical or mental impairment which substantially limits one or more of such person's major life activities; (2) a record of having such an impairment; or (3) being regarded as having such an impairment, but such term does not include current, illegal use or addiction to a controlled substance (as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802)) [Fair Housing Act Sec 802 [42 U.S.C.3602(h)]	a physical or mental impairment that substantially limits one or more major life activities, including the functions of caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working; a record of a physical or mental impairment; or being regarded as having a physical or mental impairment [ORC 4112.01(A)(13)]	Ohio's definition is more specific.
Family Status	One or more individuals (who have not attained the age of 18 years) being domiciled with- (1) a parent or another person having legal custody of such individual or individuals; or (2) the designee of such parent or other person having such custody, with the written permission of such parent or other person. The protections afforded against discrimination on the basis of familial status shall apply to any person who is pregnant or is in the process of securing legal custody of any individual who has not attained the age of 18 years. [Fair Housing Act Sec 802 [42 U.S.C.3602(k)]	(a)One or more individuals who are under eighteen years of age and who are domiciled with a parent or guardian having legal custody of the individual or domiciled, with the written permission of the parent or guardian having legal custody, with a designee of the parent or guardian; (b) Any person who is pregnant or in the process of securing legal custody of any individual who is under eighteen years of age. [ORC 4112.01(A)(15)]	None

National Origin	The Equal Employment Opportunity Commission defines national origin discrimination broadly as including, but not limited to, the denial of equal employment opportunity because of an individual's, or his or her ancestor's, place of origin; or because an individual has the physical, cultural or linguistic characteristics of a national origin group. [29 C.F.R. Part 1606]	The State of Ohio does not define 'national origin'	N/A
Race	Not clearly defined by Title VII of the Civil Rights Act of 1964 or in any related laws	The State of Ohio does not define 'race'	N/A
Color	Not clearly defined by Title VII of the Civil Rights Act of 1964 or in any related laws	The State of Ohio does not define 'color'	N/A
Religion	Includes all aspects of religious observance and practice, as well as belief [Title VII of the Civil Rights Act of 1964]	The State of Ohio does not define 'religion'	N/A
Sex	The terms "because of sex" or "on the basis of sex" include, but are not limited to, because of or on the basis of pregnancy, childbirth, or related medical conditions; and women affected by pregnancy, childbirth, or related medical conditions [Title VII of the Civil Rights Act of 1964]	The terms "because of sex" and "on the basis of sex" include, but are not limited to, because of or on the basis of pregnancy, any illness arising out of and occurring during the course of a pregnancy, childbirth, or related medical conditions. [ORC 4112.01(B)]	Worded slightly different

Ancestry	No clear legal definition- U.S. Supreme Court “suggests that the terms ‘national origin’ and ‘ancestry’ were considered synonymous.” [see: Espinoza v. Farah Mfg., 414 U.S. 86, 89 (1973).]	Not covered	N/A
Military Status	Not Covered	<p>A person's status in "service in the uniformed services" as defined in section 5923.05 of the Revised Code. [4112.01(A)(22)].</p> <p>"Service in the uniformed services" means the performance of duty, on a voluntary or involuntary basis, in a uniformed service, under competent authority, and includes active duty, active duty for training, initial active duty for training, inactive duty for training, full-time national guard duty, and performance of duty or training by a member of the Ohio organized militia pursuant to Chapter 5923 of the Revised Code [ORC 5923.05(A)(e)].</p>	N/A



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Appendix 9

Ohio Development Services Agency Community Development Standard Fair Housing Program Information Sheet



STANDARD FAIR HOUSING PROGRAM

The Office of Community Development helps Ohio communities prepare for growth and job creation by administering federally funded programs designed to promote housing, community development, infrastructure improvements, and economic development. Local governments that receive federal funds distributed by the Ohio Development Services Agency's Office of Community Development are subject to Civil Rights and Fair Housing laws, and are required to affirmatively further the purposes of the Fair Housing Act. The Office of Community Development staff works with the local communities to design and implement Standard Fair Housing Programs.

WHAT IS A STANDARD FAIR HOUSING PROGRAM?

A Standard Fair Housing Program is a community-based framework of analysis, outreach, training, and technical assistance that serves to affirmatively further the purposes of the Fair Housing Act. Through this program, local governments actively promote fair housing by appointing a local contact, analyzing impediments to fair housing choice, and providing targeted public education.

LOCAL FAIR HOUSING CONTACT

The local fair housing contact is a local government employee who provides general information, receives and processes fair housing complaints, and refers cases to the Ohio Civil Rights Commission.



EDUCATION

The Standard Fair Housing Program provides essential education regarding discrimination and fair housing rights. Local governments design an annual training program that includes presentations to residents of areas targeted for federal assistance; special populations affected by federally assisted projects; direct beneficiaries of federal housing assistance; and three additional schools, organizations or civic groups.

OUTREACH

To reach a broad community audience, local governments also develop an annual plan to distribute fair housing brochures, pamphlets, posters, and other informational materials to 10 area agencies, organizations, or public events.

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING

To help target education and outreach efforts, local governments must conduct a comprehensive analysis to identify impediments to fair housing choice within their jurisdiction. The analysis should identify policies, actions, omissions, or decisions that restrict housing choices on the basis of the seven protected classes listed in the Fair Housing Act. The seven protected classes are race, color, religion, sex, disability, familial status, and national origin. Ohio's Fair Housing Act (ORC 4112) expands the list of protected classes to include ancestry and military status. Local governments use the Analysis of Impediments to Fair Housing to develop strategies to address and overcome discriminatory policies and practices.

FOR ADDITIONAL INFORMATION

Office of Community Development
(614) 466-2285
development.ohio.gov



Development Services Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor

Lydia L. Mihalik, Director

STRENGTHENING OUR COMMUNITIES



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Services Agency

Appendix 10

Resolution of Federal Housing Discrimination Complaints

January 1, 2015 to December 31, 2015

APPENDIX 10

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Cuyahoga	2015-01	05-15-1035-8	06/18/15	Sex, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Use of discriminatory indicators		North Olmsted	44070	1
Cuyahoga	2015-02	05-15-1047-8	06/29/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	2015-04	05-16-4251-8	12/28/15	Disability	Failure to make reasonable accommodation		North Olmsted	44070	1
Cuyahoga	2015-05	05-16-4306-8	12/28/15	Disability	Discriminatory advertising, statements and notices; Failure to make reasonable accommodation	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	2015-3	05-16-4250-8	12/30/15	Race, Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	ADR/AKR43008	05-15-1294-8	06/10/15	Familial Status	Other discriminatory acts	Conciliation/settlement successful	North Olmstead	44070	1
Cuyahoga	ADR/CLE042926	05-15-0759-8	04/09/15	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Broadview Heights	44147	1
Cuyahoga	ADR/CLE38000	05-15-1150-8	07/16/15	Sex, Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cleveland	44114	1
Cuyahoga	ADRH2(42991)05082015	05-15-0863-8	05/08/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Mayfield Village	44143	1
Cuyahoga	ADRH4(43065)07282015	05-15-4061-8	07/28/15	Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga	AKR/CLE42868	05-15-0638-8	02/27/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Cleveland Heights	44118	1
Cuyahoga	AKR/CLE42894	05-15-0664-8	03/16/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Highland Hills	44122	1
Cuyahoga	AKR/CLE42947	05-15-0850-8	05/01/15	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	Cleveland	44120	1
Cuyahoga	AKR/CLE42957	05-15-0832-8	04/28/15	Disability	Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	N. Royalton	44133	1
Cuyahoga	AKR/CLE43009	05-15-1015-8	06/10/15	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	NEWBURGH HTS	44105	1
Cuyahoga	AKR/CLE43048	05-15-1311-8	07/20/15	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	Bedford Heights	44146	1
Cuyahoga	AKR/CLE43062	05-15-1140-8	07/22/15	Disability	Failure to make reasonable accommodation	No cause determination	Lakewood		1
Cuyahoga	AKR/CLE43067	05-15-1292-8	07/28/15	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	Cleveland		1
Cuyahoga	AKR/CLE43084	05-15-1337-8	08/24/15	Race	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 901 (criminal); Failure to make reasonable accommodation	No cause determination	Cleveland	44112	1
Cuyahoga	AKR/CLE43091	05-15-1338-8	08/31/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cleveland	44105	1
Cuyahoga	AKR/CLE43122	05-15-1384-8	09/22/15	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Euclid	44123	1
Cuyahoga	AKR37676	05-15-0428-8	01/20/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44109	1
Cuyahoga	AKR37689	05-15-0427-8	01/17/15	Disability	Failure to permit reasonable modification; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44109	1
Cuyahoga	AKR37881	05-15-0761-8	04/06/15	Disability	Failure to make reasonable accommodation	No cause determination	Strongsville	44136	1
Cuyahoga	AKR37998	05-15-1131-8	07/16/15	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	Cleveland	44108	1
Cuyahoga	AKR42993	05-15-0888-8	05/15/15	Disability	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cleveland	44118	1
Cuyahoga	AKR43013	05-15-1048-8	06/16/15	Disability, Retaliation	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Lakewood	44107	1

APPENDIX 10

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Cuyahoga	AKR43043	05-15-1329-8	07/13/15	Religion, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44111	1
Cuyahoga	AKRH3(38192)09162016	05-15-4327-8	09/16/15	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	North Royalton	44133	1
Cuyahoga	AKRH4(42817)01232015	05-15-0598-8	01/23/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Cleveland	44115	1
Cuyahoga	AKRH4(43011)06102015	05-15-1124-8	06/10/15	Religion, Disability, Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga	AKRH4(43061)07012015	05-15-1084-8	07/01/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Lakewood	44107	1
Cuyahoga	AKRH4(43087)08272015	05-15-1325-8	08/27/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Highland Hills	44122	1
Cuyahoga	AKRH4(43105)09162015	05-15-1404-8	09/16/15	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Warrensville Hights	44128	1
Cuyahoga	AKRH4(43110)09212015	05-15-4375-8	09/21/15	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Cleveland	44115	1
Cuyahoga	AKRH4(43112)-9162015	05-15-1373-8	09/16/15	Race	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Parma	44134	1
Cuyahoga	AKRH4(43118)09242015	05-15-1452-8	09/24/15	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	East Cleveland	44112	1
Cuyahoga	AKRH4(43129)10062015	05-16-0055-8	10/06/15	Sex, Retaliation	Discriminatory refusal to negotiate for rental; Discrimination in services and facilities relating to rental	No cause determination	Cleveland		1
Cuyahoga	AKRH4(43150)11052015	05-16-4008-8	11/05/15	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44113	1
Cuyahoga	AKRH4(43167)11232015	05-16-4118-8	11/23/15	Race	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Cleveland	44110	1
Cuyahoga	AKRH4(43182)12232015	05-16-4127-8	12/23/15	Race	Discrimination in terms and conditions of membership; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Beachwood	44122	1
Cuyahoga	AKRH4(43187)12302016	05-16-4436-8	12/30/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Elyria	44035	1
Cuyahoga	CLE042821	05-15-0602-8	01/30/15	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Cleveland	44135	1
Cuyahoga	CLE042822	05-15-0460-8	01/23/15	Race	Discrimination in the terms/conditions for making loans	No cause determination	Cleveland	44110	1
Cuyahoga	CLE042848	05-15-0652-8	02/18/15	Race, Familial Status	Discriminatory refusal to rent and negotiate for rental	Complaint withdrawn by complainant after resolution	South Euclid	44121	1
Cuyahoga	CLE042895	05-15-0678-8	03/16/15	Race	Discriminatory acts under Section 818 (coercion, Etc.)	Complainant failed to cooperate	Cleveland	44121	1
Cuyahoga	CLE042939	05-15-0765-8	04/14/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Lakewood	44107	1
Cuyahoga	CLE043057	05-15-1226-8	07/24/15	Race	Other discriminatory acts	Complaint withdrawn by complainant after resolution	Bedford	44146	1
Cuyahoga	CLE043058	05-15-1225-8	07/24/15	Race	Other discriminatory acts	Complaint withdrawn by complainant after resolution	Bedford	44146	1
Cuyahoga	CLE043097	05-15-1234-8	08/18/15	Race, Disability	Discriminatory refusal to sell; Discrimination in terms/conditions/privileges relating to sale	No cause determination	Euclid	44117	1
Cuyahoga	CLE043123	05-15-1403-8	09/25/15	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cleveland	44106	1
Cuyahoga	CLE42843	05-15-0540-8	02/09/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Beachwood	44122	1
Cuyahoga	CLE42849	05-15-0594-8	02/18/15	Race, Familial Status	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	South Euclid	44121	1
Cuyahoga	CLE42912	05-15-0749-8	03/31/15	Race	Discriminatory refusal to rent	Conciliation/settlement successful	Lakewood	44107	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Cuyahoga	CLE42913	05-15-0735-8	03/31/15	Race	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Village of Oakwood	44146	1
Cuyahoga	CLE42914	05-15-0738-8	04/01/15	Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Cleveland	44114	1
Cuyahoga	CLE42919	05-15-0843-8	04/02/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44105	1
Cuyahoga	CLE42992	05-15-0877-8	05/12/15	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Parma	44129	1
Cuyahoga	CLE43010	05-15-0982-8	06/10/15	Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Westlake	44145	1
Cuyahoga	CLE43039	05-15-1223-8	07/10/15	Disability	Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Lakewood	44107	1
Cuyahoga	CLE43059	05-15-1227-8	07/24/15	Race	Other discriminatory acts	Complaint withdrawn by complainant after resolution	Bedford	44146	1
Cuyahoga	CLE43098	05-15-1310-8	08/31/15	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Cleveland		1
Cuyahoga	CLE43120	05-15-1456-8	09/25/15	Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Cleveland	44115	1
Cuyahoga	CLEH3(37999)07162015	05-15-1274-8	07/16/15	Familial Status	Other discriminatory acts	Conciliation/settlement successful	Parma	44129	1
Cuyahoga	CLEH4(4301206152015	05-15-1273-8	06/15/15	Race, Sex, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	South Euclid	44121	1
Cuyahoga	CLEH4(43066)07282015	05-15-1391-8	07/28/15	Sex	Discriminatory advertising, statements and notices	No cause determination	Garfield Heights	44125	1
Cuyahoga	CLEH4(43126)09302015	05-15-4193-8	09/30/15	Disability	Failure to make reasonable accommodation	No cause determination	Cleveland	44109	1
Cuyahoga	CLEH4(43131)10012015	05-16-0003-8	10/01/15	Race	Discrimination in the brokering of residential real property; Refusing to provide insurance	No cause determination			1
Cuyahoga	CLEH4(43143)102620153	05-16-0102-8	10/26/15	Disability	Other discriminatory acts	No cause determination	Cleveland	44104	1
Cuyahoga	CLEH4(43157)11102015	05-16-4232-8	11/10/15	Race	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Cleveland	44113	1
Cuyahoga	CLEH4(43178)12182015	05-16-4234-8	12/18/15	Race	Discriminatory refusal to sell	No cause determination	Euclid	44143	1
Cuyahoga	CLEH4(43189)11302015	05-16-4069-8	11/30/15	Familial Status	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Cleveland	44146	1
Cuyahoga	CLEH4(43190)12102015	05-16-4071-8	12/10/15	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Parma	44129	1
Cuyahoga	CLEH4(43192)12022015	05-16-4045-8	12/02/15	Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Parma	44129	1
Cuyahoga	CLEH4(43272)12012015	05-16-4039-8	12/01/15	Race, Sex, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Cleveland		1
Cuyahoga	FH-15-01	05-15-0921-8	05/28/15	Race	Discrimination in terms/conditions/privileges relating to rental	Complainant failed to cooperate	Shaker Heights	44120	1
Cuyahoga	FH-15-02	05-15-1043-8	06/25/15	National Origin	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Unable to locate complainant	Shaker Heights	44120	1
Cuyahoga	FH-15-03	05-15-1418-8	09/30/15	Race, Familial Status	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Shaker Heights	44122	1
Cuyahoga	FH-15-04	05-15-1419-8	09/30/15	Race, Familial Status	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Shaker Heights	44122	1
Cuyahoga	TOLH4(43185)12282015	05-16-4328-8	12/28/15	Race	Other discriminatory acts	No cause determination	Cleveland	44120	1

APPENDIX 10

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Cuyahoga		05-15-1423-8	09/17/15	Race	Discrimination in the brokering of residential real property; Refusing to provide insurance	Conciliation/settlement successful			1
Defiance	Total								3
Defiance	TOLH2(37289)08042015	05-15-1256-8	08/04/15	Sex, Disability, Familial Status	Discriminatory financing (includes real estate transactions); Discrimination in the terms/conditions for making loans	Dismissed for lack of jurisdiction	Defiance	43512	1
Defiance	TOLH2(37290)08-42015	05-15-1255-8	08/04/15	Sex, Disability, Familial Status	Discrimination in the appraising of residential real property; Discriminatory brokerage service	No cause determination	Defiance	43512	1
Defiance	TOLH2(37459)11162015	05-16-4010-8	11/16/15	Sex	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Defiance	43512	1
Fairfield	Total								3
Fairfield	COL41858	05-15-1459-8	07/06/15	Disability	Failure to make reasonable accommodation	No cause determination	Lancaster		1
Fairfield	COLH1(42014)08122015	05-15-1198-8	08/12/15	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Millersport		1
Fairfield	COLH1(42080)11052015	05-16-0104-8	11/05/15	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Pickerington		1
Fayette	Total								3
Fayette	DAYH6(25308)09282015	05-15-1434-8	09/28/15	Sex, Disability, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Washington CH	43160	1
Fayette	DAYH6(25362)10262015	05-16-4029-8	10/26/15	Race	Discrimination in the terms/conditions for making loans	No cause determination	Washington Township	45458	1
Fayette	DAYH6(25445)11252015	05-16-4033-8	11/25/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Washington Court		1
Franklin	Total								39
Franklin	41854	05-15-1214-8	06/26/15	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Columbus	43204	1
Franklin	ADRH1(43045)12282015	05-16-4135-8	12/28/15	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Steering	Complaint withdrawn by complainant after resolution	Columbus	43232	1
Franklin	COL 41533	05-15-0398-8	01/13/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43232	1
Franklin	COL 41904	05-15-1102-8	07/11/15	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices	Dismissed for lack of jurisdiction	Columbus		1
Franklin	COL41443	05-15-0516-8	01/22/15	National Origin	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Columbus	43231	1
Franklin	COL41534	05-15-0422-8	01/15/15	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43223	1
Franklin	COL41536	05-15-0661-8	01/15/15	Race, National Origin, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus		1
Franklin	COL41575	05-15-0721-8	02/05/15	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Hilliard	43026	1
Franklin	COL41583	05-15-0719-8	02/23/15	Retaliation	Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Whitehall	43213	1
Franklin	COL41592	05-15-0528-8	02/06/15	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43219	1
Franklin	COL41757	05-15-0780-8	04/21/15	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Columbus	43207	1
Franklin	COL41912	05-15-1218-8	08/07/15	National Origin	Discriminatory refusal to rent	No cause determination	Columbus	43219	1
Franklin	COL41938	05-16-0073-8	10/29/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Columbus	43221	1
Franklin	COL41939	05-16-0074-8	10/29/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Columbus	43221	1
Franklin	COL41961	05-15-1305-8	08/25/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Columbus	43229	1

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Total									375
Franklin	COLH1(41593)02092015	05-15-0541-8	02/09/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43229	1
Franklin	COLH1(41614)02202015	05-15-0668-8	03/09/15	Race, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Dublin	43016	1
Franklin	COLH1(41624)02262015	05-15-0601-8	02/26/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus		1
Franklin	COLH1(41694)03112015	05-15-0641-8	03/11/15	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus		1
Franklin	COLH1(41748)04272015	05-15-1007-8	04/27/15	Race	Discrimination in the making of loans	No cause determination	Columbus		1
Franklin	COLH1(41786)04272015	05-15-0822-8	04/27/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Hilliard	43026	1
Franklin	COLH1(41863)07072015	05-15-1219-8	07/07/15	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Columbus	43206	1
Franklin	COLH1(41910)08042015	05-15-1334-8	08/04/15	Race, Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Other discriminatory acts	No cause determination	Columbus	43232	1
Franklin	COLH1(41920)08102015	05-15-1239-8	08/10/15	Sex, Retaliation	Discriminatory refusal to rent; False denial or representation of availability - rental; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Other discriminatory acts	Not Selected	Columbus	43204	1
Franklin	COLH1(41924)08122015	05-15-1453-8	08/12/15	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	No cause determination	Columbus	43232	1
Franklin	COLH1(41952)08312015	05-15-1336-8	08/31/15	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	No cause determination	Columbus	43229	1
Franklin	COLH1(41995)09182015	05-16-0059-8	10/08/15	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Obetz		1
Franklin	COLH1(42017)10062015	05-16-0004-8	10/06/15	Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Galloway	43119	1
Franklin	COLH1(42018)10012015	05-16-0001-8	10/01/15	Disability	Failure to make reasonable accommodation	No cause determination	Dublin	43016	1
Franklin	COLH1(42059)10302015	05-16-0105-8	10/30/15	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Hilliard	43026	1
Franklin	COLH1(42067)10162015	05-16-0048-8	10/16/15	Familial Status	Discriminatory refusal to rent and negotiate for rental	No cause determination	Columbus		1
Franklin	COLH1(42069)10192015	05-16-0051-8	10/19/15	Race	Discriminatory refusal to rent and negotiate for rental	Dismissed for lack of jurisdiction	Dublin	43016	1
Franklin	COLH1(42070)10052015	05-16-0023-8	10/05/15	Race, Sex, Religion	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43229	1
Franklin	COLH1(42092)11132015	05-16-4015-8	11/13/15	Race	Discriminatory refusal to negotiate for rental; False denial or representation of availability - rental	No cause determination	Canal Winchester	43110	1
Franklin	COLH1(42093)11132015	05-16-4014-8	11/13/15	Race	Discriminatory refusal to rent; False denial or representation of availability - rental	Complaint withdrawn by complainant without resolution	Reynoldsburg,	43232	1
Franklin	COLH1(43016)12012015	05-16-4228-8	12/01/15	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant without resolution	Columbus	43215	1
Franklin	COLH1(43024)12082015	05-16-4440-8	12/08/15	National Origin, Religion	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Columbus	43219	1
Franklin	COLH1(43030)12102015	05-16-4136-8	12/10/15	Race, Color, Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43223	1
Franklin	COLH1(43049)11162015	05-16-4003-8	11/16/15	National Origin	Discriminatory refusal to negotiate for rental; Otherwise deny or make housing unavailable	Dismissed for lack of jurisdiction	Columbus	43221	1
Fulton	Total								1
Fulton	TOLH2(37159)05112015	05-15-0896-8	05/11/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Archbold	43502	1

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Total									375
Geauga	Total								2
Geauga	CLE42983	05-15-1151-8	05/27/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Middlefield	44062	1
Geauga	CLEH4(43191)12032015	05-16-4048-8	12/03/15	Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Chardon	44024	1
Greene	Total								7
Greene	ADR/DAY25309	05-15-1433-8	09/29/15	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Xenia	45385	1
Greene	ADRH6(24799)	05-15-0589-8	01/16/15	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Fairborn	45324	1
Greene	DAY25018	05-15-0929-8	04/18/15	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Fairborn		1
Greene	DAYH6(25175)07152015	05-15-1147-8	07/15/15	Disability	Discrimination in terms/conditions/privileges relating to rental	Not Selected	Fairborn	45324	1
Greene	DAYH6(25177)07152015	05-15-1146-8	07/15/15	Disability	Discrimination in terms/conditions/privileges relating to rental	Not Selected	Fairborn	45324	1
Greene	DAYH6(25237)08172015	05-15-1330-8	08/17/15	Race, National Origin, Sex, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Fairborn		1
Greene	DAYH6(25262)09032015	05-15-1348-8	09/03/15	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Xenia	45385	1
Hamilton	Total								24
Hamilton	adr/DAY24970	05-15-0711-8	04/01/15	Race	Discriminatory terms, conditions, privileges, or services and facilities; Steering	Conciliation/settlement successful	Cincinnati		1
Hamilton	ADR/DAY25111	05-15-0912-8	05/26/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cincinnati		1
Hamilton	ADR/DAY25206	05-15-1082-8	07/07/15	Race, Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Cincinnati	45202	1
Hamilton	ADR/DAY25327	05-16-0009-8	10/07/15	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cincinnati		1
Hamilton	ADRH6(25326)09302015	05-15-1421-8	09/30/15	National Origin	Discriminatory refusal to negotiate for rental; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cincinnati	45211	1
Hamilton	ADRH6(25448)12032015	05-16-4050-8	12/03/15	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cincinnati	45211	1
Hamilton	DAY24795	05-15-0396-8	01/13/15	Race, Sex	Discriminatory refusal to rent; False denial or representation of availability - rental; Otherwise deny or make housing unavailable	No cause determination	Cheviot		1
Hamilton	DAY24848	05-15-0521-8	02/04/15	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Cincinnati	45205	1
Hamilton	DAY24863	05-15-0553-8	02/13/15	Race, Familial Status	Discriminatory refusal to negotiate for rental; False denial or representation of availability - rental	Dismissed for lack of jurisdiction	Cincinnati	45211	1
Hamilton	DAY24956	05-15-0672-8	03/23/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Cincinnati	45242	1
Hamilton	DAY24969	05-15-0710-8	04/01/15	Race	Discriminatory refusal to rent; False denial or representation of availability - rental; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cincinnati		1
Hamilton	DAY25007	05-15-0806-8	04/17/15	Disability	Failure to make reasonable accommodation	No cause determination	Cincinnati		1
Hamilton	DAY25041	05-15-0799-8	04/28/15	Disability	Discriminatory refusal to negotiate for rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Loveland	45140	1
Hamilton	DAY25136	05-15-1001-8	06/11/15	Disability	Failure to permit reasonable modification	Complaint withdrawn by complainant after resolution	Cincinnati	45211	1
Hamilton	DAY25180	05-15-1231-8	07/17/15	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Cincinnati		1
Hamilton	DAY25200	05-15-1315-8	08/27/15	Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati		1

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Total									375
Lake	ADR/CLE42825	05-15-0486-8	01/26/15	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Eastlake	44094	1
Lake	CLE	05-15-0487-8	01/26/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Painesville	44077	1
Lake	CLEH4(42958)11232015	05-15-0817-8	05/01/15	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Painesville	44024	1
Lawrence	Total								1
Lawrence	DAYH6(25443)11132015	05-16-0134-8	11/13/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	South Point	45680	1
Licking	Total								2
Licking	COLH1(41713)03272015	05-15-0691-8	03/27/15	Familial Status	Discriminatory refusal to negotiate for rental; Otherwise deny or make housing unavailable	Dismissed for lack of jurisdiction	Newark	43055	1
Licking		05-15-1019-8	06/19/15	Race	Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant without resolution	Pataskala	43062	1
Logan	Total								1
Logan	ADRH6(25368)10192015	05-16-0067-8	10/19/15	Race	Discriminatory refusal to rent; False denial or representation of availability - rental; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Bellefontaine	43311	1
Lorain	Total								7
Lorain	ADR/CLE42931	05-15-0787-8	04/16/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Elyria	44035	1
Lorain	AKR/CLE42963	05-15-0999-8	05/08/15	Race, Retaliation	Discriminatory refusal to sell; Blockbusting - sale; Discriminatory brokerage service; Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Avon Lake	44012	1
Lorain	AKR/CLE43060	05-15-1217-8	07/27/15	Disability	Failure to make reasonable accommodation	No cause determination	Elyria	44035	1
Lorain	CLE043145	05-16-0100-8	10/27/15	Disability	Discriminatory financing (includes real estate transactions)	Conciliation/settlement successful	North Ridgeville		1
Lorain	CLEH(43034)07022015	05-15-1148-8	07/02/15	Race, Sex, Familial Status	Otherwise deny or make housing unavailable	No cause determination	Lorain	44055	1
Lorain	CLEH4(43056)07242015	05-15-1263-8	07/24/15	Race, Sex, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Lorain	44055	1
Lorain	COL/CLE42814	05-15-0606-8	01/21/15	Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Lorain	44052	1
Lucas	Total								23
Lucas	ADR/TOL37247	05-15-1114-8	07/01/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43615	1
Lucas	ADR/TOL37412	05-16-0044-8	10/07/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43605	1
Lucas	ADR/TOL37415	05-16-0117-8	10/15/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43614	1
Lucas	TOL36968	05-15-0446-8	01/06/15	Race	Discrimination in the selling of residential real property; Discrimination in terms/conditions/privileges relating to sale	No cause determination	Toledo	43620	1
Lucas	TOL36982	05-15-0505-8	01/20/15	Race	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43614	1
Lucas	TOL36990	05-15-0510-8	01/22/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Toledo		1
Lucas	TOL37022	05-15-0563-8	02/11/15	National Origin	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Toledo	43623	1
Lucas	TOL37100	05-15-0723-8	03/31/15	Race, Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43613	1

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Total									375
Lucas	TOL37111	05-15-0736-8	04/08/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43604	1
Lucas	TOL37114	05-15-0750-8	04/09/15	Sex, Disability	Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43610	1
Lucas	TOL37203	05-15-0980-8	06/09/15	Race, Sex	Discriminatory refusal to rent	No cause determination	Toledo	43608	1
Lucas	TOL37269	05-15-1168-8	07/22/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43605	1
Lucas	TOL37389	05-15-1457-8	09/24/15	Disability	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Toledo	43614	1
Lucas	TOL37619	05-16-4137-8	12/16/15	Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Toledo	43609	1
Lucas	TOLH2(37098)03302015	05-15-0702-8	03/30/15	Disability	Failure to make reasonable accommodation	Not Selected	Toledo	43613	1
Lucas	TOLH2(37176)05212016	05-15-0908-8	05/21/15	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43615	1
Lucas	TOLH2(37221)06172015	05-15-1046-8	06/17/15	Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43614	1
Lucas	TOLH2(37347)09032015	05-15-1340-8	09/03/15	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43607	1
Lucas	TOLH2(37360)09102015	05-15-1461-8	09/10/15	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Waterville	43566	1
Lucas	TOLH2(37375)09172015	05-15-1386-8	09/17/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Toledo	43615	1
Lucas	TOLH2(37387)09252015	05-15-1408-8	09/25/15	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Toledo	43615	1
Lucas	TOLH2(37396)10052015	05-16-0126-8	10/05/15	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Waterville	43566	1
Lucas	TOLH2(37488)12022015	05-16-4053-8	12/02/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	Complaint withdrawn by complainant without resolution	Toledo	43620	1
Madison	Total								1
Madison	CLE42823	05-15-0465-8	01/23/15	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Plain City	43064	1
Mahoning	Total								4
Mahoning	ADRH3(38189)12232015	05-16-4106-8	12/23/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Youngstown	44511	1
Mahoning	AKR38056	05-15-1243-8	08/18/15	Familial Status	Discriminatory refusal to rent; Discriminatory advertisement - rental; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Youngstown	44514	1
Mahoning	AKRH3(38187)11242015	05-16-4031-8	11/24/15	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Youngstown	44502	1
Mahoning	CLE/AKR37788	05-15-0662-8	02/04/15	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Austintown	44515	1
Marion	Total								1
Marion	COLH1(41787)05012015	05-15-0834-8	05/01/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Marion	43302	1
Medina	Total								1
Medina	ADRH4(43125)09292015	05-15-1437-8	09/29/15	Disability	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Brunswick	44212	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Mercer	Total								1
Mercer	DAY25328	05-16-0007-8	10/06/15	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Celina	45822	1
Miami	Total								5
Miami	ADR/DAY25302	05-15-1431-8	09/23/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Covington	45318	1
Miami	ADR/DAY25323	05-16-0042-8	10/07/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Troy	45373	1
Miami	DAYH6(25168)07102015	05-15-1142-8	07/10/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Troy	45373	1
Miami	DAYH6(25176)07152015	05-15-1143-8	07/15/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Troy	45373	1
Miami	DAYH6(25351)10142015	05-16-0065-8	10/14/15	Familial Status, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Ludlow Falls	45339	1
Montgomery	Total								31
Montgomery	3761H	05-15-0518-8	01/08/15	Race	Discriminatory refusal to negotiate for rental	Conciliation/settlement successful	Dayton		1
Montgomery	3762H	05-15-0620-8	01/30/15	Race	Discrimination in services and facilities relating to rental	Conciliation/settlement successful	Dayton	45405	1
Montgomery	3763H	05-15-0653-8	03/09/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45402	1
Montgomery	3764H	05-15-0651-8	03/11/15	National Origin	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Dayton	45403	1
Montgomery	3768H	05-15-1004-8	06/10/15	Race	Discrimination in terms/conditions/privileges relating to rental	Unable to locate complainant	Dayton	45420	1
Montgomery	3769H	05-15-1063-8	06/29/15	Disability	Failure to make reasonable accommodation	No cause determination	Dayton	45405	1
Montgomery	3771H	05-15-1112-8	07/10/15	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton	45417	1
Montgomery	3773H	05-15-1425-8	09/08/15	National Origin	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Dayton	45420	1
Montgomery	3774H	05-15-1424-8	09/22/15	National Origin	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	Dayton	45410	1
Montgomery	3776H	05-16-0045-8	10/16/15	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Dayton	45420	1
Montgomery	3777H	05-16-4191-8	10/28/15	Familial Status	Discriminatory refusal to negotiate for rental	Conciliation/settlement successful	Dayton	45420	1
Montgomery	3778H	05-16-4192-8	11/12/15	National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton	45402	1
Montgomery	3781H	05-16-4203-8	12/17/15	Race	Discrimination in terms/conditions/privileges relating to rental	Litigation ended - discrimination found	Dayton	45405	1
Montgomery	ADR/DAY24817	05-15-0561-8	01/28/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Englewood		1
Montgomery	ADR/DAY24929	05-15-1058-8	03/20/15	Race	Discriminatory advertisement - sale; Steering	Conciliation/settlement successful	Trotwood	45426	1
Montgomery	ADR/DAY25117	05-15-0969-8	06/03/15	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Kettering		1
Montgomery	ADR/DAY25342	05-16-0043-8	10/08/15	Familial Status	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Kettering	45420	1
Montgomery	ADR/DAY25364	05-16-0083-8	10/26/15	Race, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Kettering	45419	1
Montgomery	DAY24819	05-15-0717-8	01/29/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton		1
Montgomery	DAY24820	05-15-0718-8	01/29/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton		1
Montgomery	DAY24941	05-15-0970-8	03/24/15	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Centerville		1
Montgomery	DAY24975	05-15-0967-8	04/08/15	Disability	Failure to provide accessible and usable public and common user areas	No cause determination	Miamisburg	45342	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Richland	ADRH1(41989)09162015	05-15-1368-8	09/16/15	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Complaint withdrawn by complainant after resolution	Reynoldsburg	43004	1
Richland	CLE42820	05-15-0607-8	01/28/15	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Mansfield	44906	1
Richland	CLE43096	05-15-1245-8	08/18/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Mansfield	44907	1
Richland	CLEH4(4295905012015	05-15-0819-8	05/01/15	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Mansfield	44907	1
Scioto	Total								1
Scioto	DAY25040	05-15-0767-8	04/20/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Portsmouth	45662	1
Seneca	Total								1
Seneca	TOL37008	05-15-0463-8	01/23/15	Race, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Tiffin	44883	1
Stark	Total								30
Stark	14-CNT-06	05-15-0449-8	01/09/15	Sex, Retaliation	Other discriminatory acts	Dismissed for lack of jurisdiction	Canton	44710	1
Stark	14-CNT-07	05-15-0489-8	01/27/15	Familial Status	Otherwise deny or make housing unavailable; Other discriminatory acts	Complaint withdrawn by complainant after resolution	Canton	44710	1
Stark	15-CNT-01	05-15-1385-8	09/17/15	Disability, Retaliation	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44707	1
Stark	15-CNT-02	05-15-1387-8	09/22/15	Disability	Discriminatory refusal to rent	No cause determination	Canton	44710	1
Stark	15-CNT-03	05-15-1420-8	09/30/15	Sex	Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44714	1
Stark	15-CNT-04	05-16-0062-8	10/02/15	Race	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44720	1
Stark	15-CNT-05	05-16-0035-8	10/13/15	Disability	Discriminatory refusal to negotiate for rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44714	1
Stark	15-CNT-07	05-16-4030-8	11/13/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Canton	44704	1
Stark	15-CNT-08	05-16-4062-8	11/17/15	Race	Other discriminatory acts	No cause determination	Canton	44703-1422	1
Stark	15-CNT-09	05-16-4065-8	11/19/15	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44707	1
Stark	15-CNT-10	05-16-4063-8	11/24/15	Race, Disability	Discrimination in services and facilities relating to rental; Failure to provide usable kitchens and bathrooms	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-11	05-16-4064-8	11/25/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44706	1
Stark	15-CNT-12	05-16-4066-8	12/03/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44707	1
Stark	15-CNT-13	05-16-4067-8	12/03/15	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44704	1
Stark	15-CNT-14	05-16-4059-8	12/07/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Canton	44709	1
Stark	15-CNT-15	05-16-4081-8	12/10/15	Race	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Unable to locate complainant	Canton	44704	1
Stark	15-CNT-16	05-16-4073-8	12/10/15	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-18	05-16-4116-8	12/29/15	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Canton	44703	1
Stark	15-CNT-19	05-16-4114-8	12/30/15	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Canton	44705	1
Stark	ADR/AKR37787	05-15-0484-8	01/26/15	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Alliance	44601	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Stark	ADRH3(38089)10052015	05-16-0016-8	10/05/15	Disability	Discriminatory advertisement - rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44718	1
Stark	ADRH3(38177)12212015	05-16-4134-8	12/21/15	Disability, Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertisement - rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Minerva	44657	1
Stark	AKRH3(38021)07312015	05-15-1333-8	07/31/15	Race, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Alliance	44601	1
Stark	AKRH3(38055)08142015	05-15-1220-8	08/14/15	National Origin	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44703	1
Stark	AKRH3(38099)10132015	05-16-0063-8	10/13/15	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Louisville	44641	1
Stark	AKRH3(38100)10132015	05-16-0077-8	10/13/15	Race	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Louisville	44641	1
Stark	AKRH3(38139)11162015	05-16-4009-8	11/16/15	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44718	1
Stark	AKRH3(38140)11112015	05-16-4133-8	11/12/15	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44718	1
Stark	CLE37795	05-15-0788-8	02/08/15	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Massillon	44647	1
Stark	CLEH3(37908)04222015	05-15-1060-8	04/22/15	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Canton	44707	1
Summit	Total								24
Summit	ADR/AKR37930	05-15-0900-8	05/07/15	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44306	1
Summit	ADR/CLE38050	05-15-1410-8	08/31/15	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Akron	44306	1
Summit	ADRH3(38178)12212015	05-16-4129-8	12/21/15	Disability, Familial Status	Discriminatory refusal to rent; Discriminatory advertisement - rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Barberton	44203	1
Summit	ADRH3(38179)12212015	05-16-4231-8	12/21/15	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	Akron	44319	1
Summit	ADRH3(38180)12212015	05-16-4145-8	12/21/15	Disability, Familial Status	Discriminatory refusal to rent; Discriminatory advertisement - rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44310	1
Summit	AKR/CLE42866	05-15-0617-8	02/26/15	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Strongsville	44136	1
Summit	AKR37761	05-15-0400-8	01/13/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Akron	44320	1
Summit	AKR37785	05-15-0419-8	01/13/15	Race, Sex, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Stow	44224	1
Summit	AKR37797	05-15-0583-8	02/09/15	National Origin	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Akron	44313	1
Summit	AKR37887	05-15-0805-8	04/06/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44310	1
Summit	AKR37919	05-15-0781-8	04/21/15	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cuyahoga Falls	44221	1
Summit	AKR42887	05-15-0663-8	03/12/15	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Cleveland	44035	1
Summit	AKRH3(38090)10052015	05-16-0014-8	10/05/15	Religion, Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44303	1
Summit	AKRH3(38188)12022015	05-16-4044-8	12/02/15	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44313	1
Summit	CLE/AKR37805	05-15-0654-8	02/17/15	Disability	Failure to make reasonable accommodation	No cause determination	Akron	44306	1
Summit	CLEH3(37864)03252015	05-15-0725-8	03/25/15	Disability, Retaliation	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Akron	44306	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Summit	CLEH3(37893)04082015	05-15-0747-8	04/08/15	Disability, Retaliation	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Akron	44306	1
Summit	CLEH3(37942)05192015	05-15-1303-8	05/19/15	Race	Discriminatory refusal to rent	No cause determination	Akron	44304	1
Summit	CLEH3(38091)10052015	05-16-4007-8	10/05/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44301-1252	1
Summit	CLEH4(42997)06032015	05-15-1163-8	06/03/15	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Stow	44224	1
Summit	CLEH4(42998)06032015	05-15-4354-8	06/03/15	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Stow	44224	1
Summit	CLEH4(43068)07302015	05-15-1436-8	07/30/15	Disability, Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Not Selected	Cuyahoga Falls	44221	1
Summit		05-15-0555-8	02/17/15	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Akron		1
Summit		05-15-1194-8	08/10/15	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Akron	44301	1
Trumbull	Total								5
Trumbull	ADR/AKR38074	05-15-1411-8	09/23/15	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Warren	44485	1
Trumbull	CLE43004	05-15-1344-8	06/06/15	Religion	Discriminatory refusal to rent	No cause determination	Warren	44483	1
Trumbull	CLEH3(38068)09162015	05-15-1396-8	09/16/15	Disability	Failure to make reasonable accommodation	Not Selected	Courtland	44410	1
Trumbull	CLEH4(43113)09212015	05-15-1389-8	09/21/15	Disability	Failure to make reasonable accommodation	Not Selected	Courtland	44410	1
Trumbull		05-15-1321-8	02/20/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Election made to go to court	Warren	44484	1
Vinton	Total								1
Vinton	DAYH6(25056)05122015	05-15-1059-8	05/12/15	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Hamden	45651	1
Warren	Total								4
Warren	DAY24823	05-15-0485-8	01/26/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Maineville	45039	1
Warren	DAY24847	05-15-0513-8	02/03/15	Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Franklin	45005	1
Warren	DAY24853	05-15-0833-8	02/13/15	National Origin, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Mason		1
Warren	DAY25044	05-15-1006-8	04/29/15	Sex, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	South Lebanon		1
Washington	Total								2
Washington	COLH1(41712)04012015	05-15-0709-8	04/01/15	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Marietta	45750	1
Washington	COLH1(44046)12162015	05-16-4138-8	12/16/15	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Marietta	45750	1
Williams	Total								1
Williams	ADR/TOL37145	05-15-0779-8	04/21/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Bryan	43506	1
Wood	Total								6
Wood	ADR/TOL36977	05-15-0722-8	01/16/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Bowling Green	43402	1
Wood	ADR/TOL37095	05-15-0715-8	03/26/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Bowling Green	43402	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									375
Wood	TOL37164	05-15-0904-8	05/02/15	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Bowling Green	43402	1
Wood	TOL37173	05-15-0907-8	05/19/15	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Bowling Green	43402	1
Wood	TOLH2(3731608142015	05-15-1267-8	08/14/15	Race, National Origin	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Bowling Green	43402	1
Wood	TOLH2(37427)10222015	05-16-4011-8	10/22/15	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Perrysburg	43551	1
Wyandot	Total								1
Wyandot	TOLH2(37447)11032015	05-16-0094-8	11/03/15	Race, Disability	Discrimination in terms and conditions of membership; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Upper Sandusky	43351	1



Development
Services Agency

Appendix 11

Resolution of Federal Housing Discrimination Complaints

January 1, 2016 to December 31, 2016

APPENDIX 11

Resolution of Federal Housing Discrimination Complaints in Ohio (1/1/16 - 12/31/16)

Data provided by the Ohio Civil Rights Commission

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									397
Allen	Total								5
Allen	(DAY) H6 (25978) 10122016	05-17-7927-8	10/12/16	Race	Discriminatory refusal to rent; Discriminatory refusal to negotiate for rental; False denial or representation of availability - rental	No cause determination	Lima	45801	1
Allen	DAYH6(25659)05032 016	05-16-4733-8	05/03/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Lima	45804	1
Allen	DAYH6(25671)05062 016	05-16-4763-8	05/06/16	Race	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Bluffton		1
Allen	DAYH6(25672)05062 016	05-16-4762-8	05/06/16	Race	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Bluffton	45817	1
Allen	DAYH6(25927)09152 016	05-16-2229-8	09/15/16	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Bluffton	45817	1
Ashtabula	Total								4
Ashtabula	AKRH4(43274)01292 016	05-16-4275-8	01/29/16	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Not Selected	Conneaut	44030	1
Ashtabula	CLEH4(43621)09302 016	05-16-9556-8	09/30/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Ashtabula	44004	1
Ashtabula	CLEH4(44014)09152 016	05-16-5294-8	09/15/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Ashtabula	44004	1
Ashtabula	HUD REQ WAIVER 6/28/2016	05-16-4824-8	06/22/16	Familial Status	Discrimination in the terms/conditions for making loans	Complaint withdrawn by complainant after resolution	Painesville	44077	1
Athens	Total								1
Athens	COLH1(44382)07082 016	05-16-8031-8	07/08/16	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	New Marshfield	45766	1
Belmont	Total								3
Belmont	ADRH1(44108)03152 016	05-16-4532-8	03/15/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Flushing	43977	1
Belmont	ADRH1(44109)03152 016	05-16-4531-8	03/15/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Flushing	43977	1
Belmont	COLH1(44249)05162 016	05-16-4971-8	05/23/16	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Bridgeport	43912	1
Brown	Total								1
Brown	ADRH6(25753)05202 016	05-16-4722-8	05/20/16	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Georgetown	45121	1
Butler	Total								8
Butler	COLH1(25716)05192 016	05-16-5994-8	05/19/16	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Fairfield	45014	1
Butler	DAYH6(25863)08092016	05-16-5010-8	08/09/16	Disability	Discriminatory refusal to rent		Hamilton	45011	1
Butler	DAYH6(25838)08022 016	05-16-4983-8	08/02/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	West Chester	45069	1
Butler	DAYH6(25961)09302 016	05-16-9738-8	09/30/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Hamilton	45011	1
Butler	DAYH6(26113)11292 016	05-17-6277-8	11/29/16	Race	Discriminatory refusal to rent	No cause determination	Middleton	45044	1
Butler	TOLH6(25667)05062 016	05-16-6398-8	05/06/16	Race, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Farfield	45014	1

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Total									397
Butler	TOLH6(25752)06102016	05-16-4771-8	06/10/16	Race	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution	West Chester	45069	1
Butler	TOLH6(25799)06172016	05-16-4804-8	06/17/16	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	Administrative hearing ended - no discrimination found	Hamilton	45011	1
Clark	Total								7
Clark	DAYH6(25645)04292016	05-16-4685-8	04/29/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Steering	Conciliation/settlement successful	Springfield	45504	1
Clark	DAYH6(25580)03232016	05-16-4631-8	03/23/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Springfield	45503	1
Clark	DAYH6(25586)03292016	05-16-4526-8	03/29/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Springfield	45503	1
Clark	DAYH6(25682)05112016	05-16-4713-8	05/11/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Springfield	45503	1
Clark	DAYH6(25844)11162016	05-17-6133-8	11/16/16	Sex, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Springfield	45503	1
Clark	DAYH6(26060)11212016	05-17-7713-8	11/21/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	Conciliation/settlement successful	South Vienna	45369	1
Clark	TOLH6(25527)01152016	05-16-4236-8	01/15/16	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Springfiel		1
Clermont	Total								2
Clermont	DAYH6(25954)09262016	05-16-5494-8	09/26/16	National Origin	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental	No cause determination	Amelia	45103	1
Clermont	TOLH6(25518)02182016	05-16-4521-8	02/18/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Milford	45150	1
Clinton	Total								1
Clinton	DAYH6(25956)09232016	05-16-5495-8	09/23/16	Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Wilmington	45177	1
Columbiana	Total								1
Columbiana	AKRH3(38473)06272016	05-16-5455-8	06/27/16	Sex	Discriminatory refusal to rent	No cause determination	Salem	44460	1
Cuyahoga	Total								83
Cuyahoga	(CLE) H4 (43523) 08012016	05-16-6734-8	08/01/16	Race, Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Richmond Heights	44143	1
Cuyahoga	(CLE) H4 (43578) 09012016	05-16-6152-8	09/01/16	Sex, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution	Euclid	44123	1
Cuyahoga	(CLE) H4 (43727)12072016	05-17-7157-8	12/07/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44114	1
Cuyahoga	ADR/AKRH4(43468)06272016	05-16-4879-8	06/27/16	Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cleveland	44128	1
Cuyahoga	ADRH3(38293)03302016	05-16-4635-8	03/30/16	Disability, Familial Status	Discriminatory refusal to sell; Discriminatory advertising, statements and notices; Failure to make reasonable accommodation	Conciliation/settlement successful	Parma Heights	44130	1
Cuyahoga	ADRH4(43194)01042016	05-16-4543-8	01/04/16	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Brooklyn Heights	44131	1
Cuyahoga	ADRH4(43201)01072016	05-16-4305-8	01/07/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Berea	44017	1
Cuyahoga	ADRH4(43296)03072016	05-16-4431-8	03/07/16	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Complaint withdrawn by complainant after resolution	Rocky River	44116-4411	1

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Total									397
Cuyahoga	ADRH4(43311)03182016	05-16-4695-8	03/18/16	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Rocky River	44116	1
Cuyahoga	ADRH4(43312)03182016	05-16-4458-8	03/21/16	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Rocky River	44116	1
Cuyahoga	ADRH4(43371)01052016	05-16-4589-8	01/05/16	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Parma	44129	1
Cuyahoga	ADRH4(43390)05102016	05-16-4719-8	05/10/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	ADRH4(43392)05102016	05-16-4703-8	05/10/16	Disability, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Parma	44130	1
Cuyahoga	ADRH4(43479)07052016	05-16-5018-8	07/05/16	National Origin	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Lakewood	44107	1
Cuyahoga	ADRH4(43503)07132016	05-16-4899-8	07/13/16	Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Cleveland	44106	1
Cuyahoga	ADRH4(43633)10122016	05-17-5753-8	10/12/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Cleveland	44144	1
Cuyahoga	ADRH4(43721)12012016	05-17-6612-8	12/01/16	Familial Status	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Rocky River	44116	1
Cuyahoga	AKR H4 (43492)07122016	05-16-5811-8	07/21/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Brook Park	44142	1
Cuyahoga	AKRH3(38580)10172016	05-17-5774-8	10/17/16	National Origin, Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Lakewood	44107	1
Cuyahoga	AKRH3(38601)10262016	05-17-7195-8	10/26/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Brook Park	44142	1
Cuyahoga	AKRH3(43268)02192016	05-16-4524-8	02/19/16	Disability	Discriminatory refusal to rent and negotiate for rental	No cause determination	Cleveland	44104	1
Cuyahoga	AKRH4(3270)02222016	05-16-4513-8	02/22/16	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Lakewood	44107	1
Cuyahoga	AKRH4(43211)01252016	05-16-4518-8	01/25/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Euclid	44117	1
Cuyahoga	AKRH4(43249)02102016	05-16-4519-8	02/10/16	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cleveland	44110	1
Cuyahoga	AKRH4(43275)02052016	05-16-4303-8	02/05/16	National Origin, Sex, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Cleveland	44109	1
Cuyahoga	AKRH4(43300)03112016	05-16-4454-8	03/11/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Bedford Heights	44146	1
Cuyahoga	AKRH4(43335)03032016	05-16-4391-8	03/03/16	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Cleveland Cuyahoga	44127	1
Cuyahoga	AKRH4(43347)04122016	05-16-4944-8	04/12/16	Race, Sex, Retaliation	Discriminatory refusal to sell; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	shaker heights	44122	1
Cuyahoga	AKRH4(43366)04182016	05-16-4554-8	04/18/16	Sex	Discriminatory refusal to rent and negotiate for rental; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Bedford Heights	44146	1
Cuyahoga	AKRH4(43389)05102016	05-16-4946-8	05/10/16	Familial Status	Other discriminatory acts	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	AKRH4(43394)05022016	05-16-4611-8	05/02/16	Disability	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cleveland	44135	1

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Total									397
Cuyahoga	AKRH4(43445)06142016	05-16-4840-8	06/14/16	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cleveland Heights	44118	1
Cuyahoga	AKRH4(43450)06162016	05-16-4976-8	06/16/16	Disability	False denial or representation of availability - rental	No cause determination	Cleveland	44125	1
Cuyahoga	AKRH4(43460)06242016	05-16-5006-8	06/24/16	Race	Discriminatory refusal to sell	Complaint withdrawn by complainant without resolution	Cleveland Heights	44118	1
Cuyahoga	AKRH4(43461)06242016	05-16-5005-8	06/24/16	Race	Discriminatory refusal to rent; False denial or representation of availability; Other discriminatory acts	Conciliation/settlement successful	Cleveland Heights	44118	1
Cuyahoga	AKRH4(43464)06242016	05-16-5037-8	06/24/16	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Use of discriminatory indicators	Conciliation/settlement successful	Parma	44129	1
Cuyahoga	AKRH4(43493)07132016	05-16-6211-8	07/18/16	Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cleveland	44119	1
Cuyahoga	AKRH4(43502)07202016	05-16-5012-8	07/20/16	Color, National Origin, Disability, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Brecksville	44141	1
Cuyahoga	AKRH4(43510)07082016	05-16-4907-8	07/08/16	Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Warrensville Heights	44022	1
Cuyahoga	AKRH4(43657)10132016	05-17-5690-8	10/13/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Garfield Heights	44125	1
Cuyahoga	AKRH4(43658)10192016	05-17-5785-8	10/19/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44113	1
Cuyahoga	AKRH4(43712)11232016	05-17-6391-8	11/23/16	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Highland Hills	44122	1
Cuyahoga	AKRH4(43731)12082016	05-17-6632-8	12/08/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Using ordinances to discriminate in zoning and land use; Failure to make reasonable accommodation	Conciliation/settlement successful	Oakwood Village	44146	1
Cuyahoga	AKRH4(43732)12082016	05-17-6631-8	12/08/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	Conciliation/settlement successful	Oakwood Village	44146	1
Cuyahoga	AKRH4(43733)12092016	05-17-7813-8	12/09/16	Race, Sex, Retaliation	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Cleveland	44135	1
Cuyahoga	CLEH3(38292)03302016	05-16-4626-8	03/30/16	Race	Discriminatory refusal to rent; Discriminatory advertisement - rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cleveland	44113	1
Cuyahoga	CLEH4(3646)0192016	05-17-5812-8	10/19/16	Race, Sex, Religion, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Other discriminatory acts	No cause determination	North Royalton	44133	1
Cuyahoga	CLEH4(43219)01272016	05-16-4659-8	01/27/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Broadview Heights	44147	1
Cuyahoga	CLEH4(43273)01152016	05-16-4205-8	01/15/16	Race	Discriminatory refusal to rent	Conciliation/settlement successful	South Euclid	44121	1
Cuyahoga	CLEH4(43290)03022016	05-16-4586-8	03/02/16	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Berea	44017	1
Cuyahoga	CLEH4(43332)04052016	05-16-4633-8	04/05/16	Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Avon Lake	44012	1
Cuyahoga	CLEH4(43334)02082016	05-16-4359-8	02/08/16	Sex	Discriminatory refusal to rent; False denial or representation of availability - rental; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Maple Heights	44137	1

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Cuyahoga	CLEH4(43345)04122016	05-16-4768-8	04/12/16	Familial Status	Discriminatory advertising, statements and notices	No cause determination	Rocky River	44116	1
Cuyahoga	CLEH4(43369)04232016	05-16-4718-8	04/23/16	Disability	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	North Olmsted	44070	1
Cuyahoga	CLEH4(43373)04052016	05-16-4591-8	04/05/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Olmsted Township	44138	1
Cuyahoga	CLEH4(4338205032016	05-16-4666-8	05/03/16	Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	CLEH4(43391)05102016	05-16-6853-8	05/10/16	Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Conciliation/settlement successful	Parma	44129	1
Cuyahoga	CLEH4(43398)05112016	05-16-4805-8	05/11/16	Race	Discriminatory refusal to rent; Other discriminatory acts	Conciliation/settlement successful	South Euclid	44121	1
Cuyahoga	CLEH4(43412)04202016	05-16-4572-8	04/20/16	Sex	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Cleveland	44102	1
Cuyahoga	CLEH4(43456)06172016	05-16-4875-8	06/17/16	Retaliation	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Cleveland	44115	1
Cuyahoga	CLEH4(43457)06152016	05-16-4786-8	06/15/16	Race	Discriminatory refusal to negotiate for rental	Dismissed for lack of jurisdiction	Cleveland	44111	1
Cuyahoga	CLEH4(43462)06242016	05-16-5049-8	06/24/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts		North Olmsted	44070	1
Cuyahoga	CLEH4(43463)06242016	05-16-6317-8	06/24/16	Sex, Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cleveland	44110	1
Cuyahoga	CLEH4(43465)06242016	05-16-5046-8	06/24/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	CLEH4(43466)06242016	05-16-7271-8	06/24/16	Familial Status	Discriminatory advertisement - rental	Conciliation/settlement successful	Cleveland	44112	1
Cuyahoga	CLEH4(43511)07192016	05-16-4908-8	07/19/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Euclid	44117	1
Cuyahoga	CLEH4(43515)07282016	05-16-5054-8	07/28/16	Race	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	Bedford Heights	44146	1
Cuyahoga	CLEH4(43550)08122016	05-16-7676-8	08/12/16	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Cleveland	44106	1
Cuyahoga	CLEH4(43563)08262016	05-16-5175-8	08/26/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Parma Heights	44130	1
Cuyahoga	CLEH4(43574)08302016	05-16-5714-8	08/30/16	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Cleveland	44108	1
Cuyahoga	CLEH4(43590)09092016	05-16-6400-8	09/09/16	Race	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Bedford	44125	1
Cuyahoga	CLEH4(43591)09102016	05-16-6411-8	09/10/16	Race	Discriminatory refusal to rent	No cause determination	Cleveland	44128	1
Cuyahoga	CLEH4(43688)11082016	05-17-6633-8	11/08/16	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	North Olmsted	44070	1
Cuyahoga	CLEH4(43804)12142016	05-17-6481-8	12/14/16	Race, Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Cleveland Heights	44125	1
Cuyahoga	FH-03-16	05-17-6492-8	11/23/16	Disability	Discriminatory refusal to rent; Discriminatory advertisement - rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Shaker Heights	44120	1
Cuyahoga	FH-16-02	05-17-6006-8	11/01/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Shaker Heights	44122	1

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Cuyahoga	FH-16-05	05-17-5713-8	10/14/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Shaker Heights	44120	1
Cuyahoga	FHAP REQ WAIVER 5/11/2016	05-16-4557-8	04/18/16	Race	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Rocky River	44116	1
Cuyahoga	HUD REQ WAIVER 4-20-2016	05-16-4549-8	04/11/16	Sex	False denial or representation of availability; Discriminatory terms, conditions, privileges, or services and facilities; Steering; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cleveland	44114	1
Cuyahoga		05-16-4563-8	04/19/16	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Solon	44139	1
Cuyahoga		05-16-4612-8	03/15/16	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Fairview Park	44126	1
Cuyahoga		05-16-4615-8	05/02/16	Disability	Using ordinances to discriminate in zoning and land use		Middleburg Heights	44130	1
Cuyahoga		05-16-4859-8	07/01/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Euclid	44132	1
Delaware	Total								5
Delaware	CLEH4(43337)03312 016	05-16-4486-8	03/31/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Lewis Center	43035	1
Delaware	COLH1(44610)10032 016	05-17-9558-8	10/03/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Delaware	43015	1
Delaware	COLH1(44706)11162 016	05-17-6854-8	11/11/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to provide an accessible route into and thru the covered unit; Failure to permit reasonable modification	Complaint withdrawn by complainant after resolution	Lewis Center	43035	1
Delaware	COLH1(44724)11182 016	05-17-6154-8	11/18/16	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Delaware	43015	1
Delaware	COLH1(44751)11082 016	05-17-6374-8	12/06/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Powell	43065	1
Erie	Total								1
Erie	CLEH4(43699)11032 016	05-17-6002-8	11/03/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Vermilion	44089	1
Fairfield	Total								2
Fairfield	COLH1(44048)01282 016	05-16-4266-8	01/28/16	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Reynoldsburg	43068	1
Fairfield	COLH1(4442904240 217	05-16-5030-8	04/24/16	Sex, Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Pickerington	43147	1
Franklin	Total								33
Franklin	ADRH1(43077)01222 016	05-16-4445-8	01/22/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Columbus	43215	1
Franklin	ADRH1(44004)02032 016	05-16-4446-8	02/03/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Columbus	43228	1
Franklin	ADRH1(44074) 1042016	05-17-6013-8	11/04/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Bexley	43209	1
Franklin	COL44572	05-16-5871-8	09/23/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Dublin	43016	1

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Total									397
Franklin	COLH1(44513)08302016	05-16-5991-8	08/30/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Whitehall	43213	1
Franklin	COLH1(44605)10072016	05-17-5681-8	10/07/16	Disability	Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43206	1
Franklin	COLH1(4464310252016	05-17-5971-8	10/25/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Columbus	43214	1
Franklin	COLH1(43074)01202016	05-16-4464-8	01/20/16	Race, Retaliation	Discriminatory advertising, statements and notices; Adverse action against an employee; Discriminatory acts under Section 818 (coercion, Etc.)	FHAP judicial dismissal	Columbus	43235	1
Franklin	COLH1(44011)02082016	05-16-4467-8	02/08/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43215	1
Franklin	COLH1(44013)02082016	05-16-4465-8	02/08/16	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	columbus		1
Franklin	COLH1(44042)02162016	05-16-4336-8	02/16/16	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	Columbus	43231	1
Franklin	COLH1(44044)02022016	05-16-4290-8	02/02/16	Race, Sex, Familial Status	Discriminatory refusal to rent	Dismissed for lack of jurisdiction	Westerville	43081	1
Franklin	COLH1(44045)01222016	05-16-4241-8	01/22/16	Familial Status	Discriminatory refusal to rent and negotiate for rental; Otherwise deny or make housing unavailable	Dismissed for lack of jurisdiction	Columbus	43209	1
Franklin	COLH1(44171)04222016	05-16-4960-8	07/05/16	Disability	Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	Complaint withdrawn by complainant without resolution	Hilliard	43026	1
Franklin	COLH1(44206)04192016	05-16-4564-8	04/19/16	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43231	1
Franklin	COLH1(44229)04282016	05-16-4650-8	04/28/16	National Origin, Religion	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dublin	43016	1
Franklin	COLH1(44338)06212016	05-16-5190-8	06/21/16	Retaliation	Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Other discriminatory acts	Complaint withdrawn by complainant after resolution	Dublin	43016	1
Franklin	COLH1(44339)06212016	05-16-5191-8	06/21/16	Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Other discriminatory acts	Complaint withdrawn by complainant after resolution	Dublin	43016	1
Franklin	COLH1(44360)06242016	05-16-4966-8	06/24/16	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Columbus	43231	1
Franklin	COLH1(44405)07192016	05-16-5493-8	07/19/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Columbus	43201	1
Franklin	COLH1(44428)07222016	05-16-4991-8	07/22/16	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to sale; Steering	No cause determination	Reynoldsburg	43068	1
Franklin	COLH1(44440)08052016	05-16-5015-8	08/05/16	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43205	1
Franklin	COLH1(44444)08082016	05-16-5047-8	08/08/16	Disability	Discriminatory refusal to rent; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43215	1
Franklin	COLH1(44474)08172016	05-16-5683-8	08/17/16	Race, Color	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43224	1
Franklin	COLH1(44475)08172016	05-16-5746-8	08/17/16	Race, Color	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43224	1
Franklin	COLH1(44512)08302016	05-16-6333-8	09/30/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Whitehall	43213	1

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Franklin	COLH1(44571)09232016	05-16-5876-8	09/23/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Dublin	43016	1
Franklin	COLH1(44589)09272016	05-16-6031-8	09/27/16	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Columbus	43234	1
Franklin	COLH1(44630)10182016	05-17-5874-8	10/18/16	Disability	Discriminatory refusal to rent; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Reynoldsburg	43068	1
Franklin	COLH1(44641)10202016	05-17-6234-8	10/20/16	Disability	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Reynoldsburg	43068	1
Franklin	COLH1(44649)10282016	05-17-7776-8	10/28/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Blacklick	43004	1
Franklin	COLH1(44824)12222016	05-17-6634-8	12/22/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Columbus	43202	1
Franklin	COLH1(44826)12222016	05-17-0279-8	12/22/16	Race, Religion	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43228	1
Fulton	Total								2
Fulton	TOLH2(37708)04042016	05-16-4517-8	04/04/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Archbold	43502	1
Fulton	TOLH2(38100)10312016	05-17-6010-8	10/31/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Archbold	43502	1
Geauga	Total								1
Geauga	AKRH4(43659)10202016	05-17-5794-8	10/20/16	Race	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Chardon	44024	1
Greene	Total								7
Greene	ADRH6(25746)06152016	05-16-4880-8	06/15/16	Disability	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Fairborn	45324	1
Greene	COLH1(25723)06022017	05-16-6001-8	06/02/16	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Bellbrook	45305	1
Greene	DAYH6(25526)01282016	05-16-4267-8	01/28/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Xenia	45385	1
Greene	DAYH6(25637)04112016	05-16-4539-8	04/11/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Xenia	45385	1
Greene	DAYH6(25700)05182016	05-16-4760-8	05/18/16	Disability	Failure to make reasonable accommodation	No cause determination	Fairborn	45324	1
Greene	DAYH6(25899)09062016	05-16-5692-8	09/06/16	Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Fairborn	45324	1
Greene	HUD REQ WAIVER 6/20/2016	05-16-4756-8	06/03/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complainant failed to cooperate	Xenia		1
Hamilton	Total								25
Hamilton	ADRH6(25600)01292016	05-16-4278-8	01/29/16	Race	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Cincinnati	45230	1
Hamilton	ADRH6(25797)06242016	05-16-4845-8	06/24/16	Race	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale	Conciliation/settlement successful	Middletown	45044	1

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Hamilton	ADRH6(25824)07262016	05-16-4942-8	07/26/16	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45219	1
Hamilton	ADRH6(25955)09232016	05-16-5450-8	09/23/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Cincinnati	45205	1
Hamilton	ADRH6(26187)12302016	05-17-6592-8	12/30/16	Disability	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Cincinnati	45239	1
Hamilton	COLH1(25803)07142016	05-16-5996-8	07/14/16	Race	Discriminatory financing (includes real estate transactions); Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cincinnati	45240	1
Hamilton	COLH6(25807)07202016	05-16-6477-8	07/20/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Cincinnati	45224	1
Hamilton	DAYH6(25605)04112016	05-16-4684-8	04/11/16	Race	Discrimination in the terms/conditions for making loans	No cause determination	Cincinnati	45240	1
Hamilton	DAYH6(25523)02042016	05-16-4298-8	02/04/16	Disability	Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cincinnati	45202	1
Hamilton	DAYH6(25523)02042016	05-16-4527-8	02/04/16	Disability	Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cincinnati	45202	1
Hamilton	DAYH6(25524)01282016	05-16-4265-8	01/28/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cincinnati	45240	1
Hamilton	DAYH6(25689)04262016	05-16-4602-8	04/26/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Cincinnati	45244	1
Hamilton	DAYH6(25798)06202016	05-16-4803-8	06/20/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cincinnati	45205	1
Hamilton	DAYH6(25845)07112016	05-16-5875-8	07/11/16	Race, Color, Sex	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Cincinnati	45227	1
Hamilton	DAYH6(25957)09282016	05-16-5541-8	09/28/16	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices	Dismissed for lack of jurisdiction	Cincinnati	45242	1
Hamilton	DAYH6(25958)09282016	05-16-5542-8	09/28/16	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices	Dismissed for lack of jurisdiction	Cincinnati	45242	1
Hamilton	DAYH6(25960)09302016	05-16-9555-8	09/30/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Cincinnati	45202	1
Hamilton	DAYH6(25968)10112016	05-17-0146-8	10/11/16	Race, Color, Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cincinnati	45213	1
Hamilton	DAYH6(26012)10172016	05-17-5745-8	10/17/16	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Cincinnati	45206	1
Hamilton	DAYH6(26050)11082016	05-17-7928-8	11/08/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	Conciliation/settlement successful	Cincinnati	45211	1
Hamilton	P16-0296	09-17-5620-8	10/05/16	Disability	Discrimination in the making of loans	No cause determination	Cincinnati	45201	1
Hamilton	TOLH6((25625)04192016	05-16-4565-8	04/19/16	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cincinnati	45251	1
Hamilton	TOLH6(25525)01082016	05-16-4163-8	01/08/16	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Cincinnati	45239	1
Hamilton	TOLH6(25638)04152016	05-16-4585-8	04/15/16	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cincinnati	45238	1
Hamilton		05-16-4208-8	01/15/16	Sex	Other discriminatory acts	No cause determination	Cincinnati	45230	1
Hancock	Total								2
Hancock	TOLH2(37544)01132016	05-16-4213-8	01/13/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	Findlay	45840	1
Hancock	TOLH2(37730)04112016	05-16-4593-8	04/11/16	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Findlay	45840	1
Jefferson	Total								2
Jefferson	ADRH3(38536)09092016	05-16-5239-8	09/09/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Toronto	43964	1

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Jefferson	ADRH3(38537)09092016	05-16-5240-8	09/09/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Toronto	43964	1
Knox	Total								1
Knox	AKRH3(38681)11302016	05-17-6293-8	11/30/16	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Mount Vernon	43050	1
Lake	Total								9
Lake	ADR/AKRH4(43372)02172016	05-16-4584-8	02/17/16	Disability, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Mentor	44060	1
Lake	ADRH4(43338)04042016	05-16-4488-8	04/04/16	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Mentor		1
Lake	CLEH4(43336)04012016	05-16-4481-8	04/01/16	Disability, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Eastlake	44095	1
Lake	CLEH4(43494)06262016	05-16-4846-8	06/26/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Kirtland	44094	1
Lake	CLEH4(43495)07082016	05-16-4888-8	07/08/16	Race	Discriminatory refusal to negotiate for sale; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Steering	No cause determination	Eastlake	44095	1
Lake	CLEH4(43512)07212016	05-16-4928-8	07/21/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Concord	44070	1
Lake	CLEH4(43542)08062016	05-16-5657-8	08/06/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Painesville	44077	1
Lake	CLEH4(43569)08292016	05-16-5710-8	08/29/16	National Origin, Disability, Retaliation	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Mentor	44060	1
Lake	HUD REQ WAIVER 428-2016	05-16-4600-8	04/26/16	Familial Status	Discriminatory advertisement - sale; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Painesville	44077	1
Licking	Total								1
Licking	COLH1(44252)05162016	05-16-4949-8	05/16/16	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Newark	43055	1
Logan	Total								2
Logan	DAYH6(25934)09202016	05-16-5374-8	09/20/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Bellefontaine	43311	1
Logan	TOLH6(25494)02082016	05-16-4544-8	02/08/16	Disability	Discriminatory refusal to sell; Discriminatory refusal to negotiate for sale; Discriminatory refusal to sell and negotiate for sale; False denial or representation of availability - sale; Discrimination in terms/conditions/privileges relating to sale	No cause determination	Lakeview	43331	1
Lorain	Total								10
Lorain	(CLE) H4 (43765) 12282016	05-17-2230-8	12/28/16	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Lorain	44052	1
Lorain	ADRH4(4327602112016	05-16-4331-8	02/11/16	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Lorain	44055	1
Lorain	AKRH4(43388)05092016	05-16-4704-8	05/09/16	Race, Retaliation	Discriminatory refusal to rent	No cause determination	Elyria	44035	1
Lorain	AKRH4(43697)11022016	05-17-6007-8	11/02/16	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Elyria	44035	1
Lorain	AKRH4(43698)11022016	05-17-6009-8	11/02/16	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Elyria	44035	1

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Lorain	CLEH4(43279)02242016	05-16-4540-8	02/24/16	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Elyria	44035	1
Lorain	CLEH4(43592)09122016	05-16-5328-8	09/12/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Elyria	44035	1
Lorain	CLEH4(43706)11182016	05-17-7253-8	11/18/16	Race	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	No cause determination	Lorain	44052	1
Lorain	CLEH4(43764)02282016	05-17-8718-8	12/28/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Lorain	44055	1
Lorain		05-16-4839-8	06/23/16	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Complainant failed to cooperate	Vermilion	44089	1
Lucas	Total								23
Lucas	ADRH2(37566)01262016	05-16-4334-8	01/26/16	Race	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Toledo	43614	1
Lucas	ADRH2(37653)03032016	05-16-4435-8	03/03/16	Disability	Refusing to provide municipal services or property; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43608	1
Lucas	ADRH2(37694)03282016	05-16-4459-8	03/28/16	Retaliation	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Oregon	43616	1
Lucas	ADRH2(37701)03312016	05-16-4512-8	03/31/16	Sex	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Toledo	43612	1
Lucas	ADRH2(37800)05172016	05-16-4779-8	05/17/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43607	1
Lucas	ADRH2(38085)10262016	05-17-6073-8	10/26/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43615	1
Lucas	HUD REQ WAIVER 5/11/2016	05-16-4656-8	05/06/16	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43613	1
Lucas	HUD REQ WAIVER 7/27/16	05-16-4922-8	07/21/16	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Toledo	43607	1
Lucas	TOL37569	05-16-4299-8	01/27/16	Race, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Sylvania	43560	1
Lucas	TOLH2(37618)01052016	05-16-4128-8	01/05/16	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Toledo	43614	1
Lucas	TOLH2(37669)03162016	05-16-4508-8	03/16/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43614-3179	1
Lucas	TOLH2(37670)03162016	05-16-4476-8	03/16/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43614-3179	1
Lucas	TOLH2(37671)03162016	05-16-4505-8	03/16/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43614	1
Lucas	TOLH2(37688)03242016	05-16-4450-8	03/24/16	Sex	Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant without resolution	Toledo	43614	1
Lucas	TOLH2(37751)04212016	05-16-4625-8	04/21/16	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Toledo	43614	1

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Lucas	TOLH2(37755)04252016	05-16-4674-8	04/25/16	Race, Religion	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Toledo	43551	1
Lucas	TOLH2(37756)04252016	05-16-4637-8	04/25/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43610	1
Lucas	TOLH2(37759)04262016	05-16-4649-8	04/26/16	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	Toledo	43612	1
Lucas	TOLH2(38025)09202016	05-16-5912-8	09/20/16	Sex	Discriminatory refusal to negotiate for rental; Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43614	1
Lucas	TOLH2(38165)11302016	05-17-6472-8	11/30/16	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Toledo	43623	1
Lucas	TOLH2(38167)10052016	05-17-5641-8	10/05/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Toledo	43615	1
Lucas	TOLH2(38193)12132016	05-17-6531-8	12/13/16	Sex	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43604	1
Lucas	TOLH2(38197)12142016	05-17-6534-8	12/14/16	Disability	Failure to make reasonable accommodation	No cause determination	Toledo	43604	1
Mahoning	Total								6
Mahoning	ADRH3(38460)8/2/2016	05-16-4977-8	08/02/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Youngstown	44511	1
Mahoning	AKRH3(38538)08292016	05-16-5131-8	08/29/16	Race	Discriminatory refusal to sell; False denial or representation of availability - sale; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Youngstown	44507	1
Mahoning	CLE038201	05-16-4377-8	01/21/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Youngstown	44509	1
Mahoning	CLEH3(38229)02162016	05-16-4730-8	02/16/16	Disability	Other discriminatory acts	No cause determination	Campbell	44405	1
Mahoning	CLEH3(38333)04262016	05-16-4667-8	04/26/16	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Youngstown	44504	1
Mahoning	CLEH3(38444)07192016	05-16-4910-8	07/19/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Poland	44514	1
Medina	Total								4
Medina	(CLE) H4 (43635) 10142016	05-17-7256-8	10/14/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Brunswick	44212	1
Medina	ADRH3(38235)02192016	05-16-4369-8	02/26/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification	Complaint withdrawn by complainant after resolution	Seville	44273	1
Medina	ADRH3(38666)12052016	05-17-6403-8	12/05/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	Conciliation/settlement successful	Medina	44256	1
Medina	AKRH3(38419)07052016	05-16-4881-8	07/05/16	Disability	Discrimination in services and facilities relating to rental	No cause determination	Medina	44256	1
Mercer	Total								1
Mercer		05-16-4297-8	01/28/16	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Celina	45822	1
Miami	Total								3
Miami	ADRH6(25784)07072016	05-16-4947-8	07/07/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Tipp City	45371	1
Miami	ADRH6(26111)12132016	05-17-6433-8	12/13/16	Disability	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Tipp City	45371	1

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Miami	DAYH6(25796)07062016	05-16-4870-8	07/06/16	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Dayton	45403	1
Monroe	Total								1
Monroe	COLH1(44954)12012016	05-17-6336-8	12/01/16	Sex	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Woodsfield	43793	1
Montgomery	Total								26
Montgomery	3782H	05-16-4410-8	02/05/16	Sex	Other discriminatory acts	No cause determination	dayton	45403	1
Montgomery	3783H	05-16-4423-8	03/11/16	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Unable to locate complainant	Dayton	45420	1
Montgomery	3784H	05-16-4798-8	05/10/16	National Origin	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Dayton	45420	1
Montgomery	3785H	05-16-5999-8	06/27/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Unable to locate complainant	Dayton	45406	1
Montgomery	3787H	05-16-5992-8	09/09/16	Disability	Discriminatory refusal to rent; Failure to permit reasonable modification	Conciliation/settlement successful	Dayton	45431	1
Montgomery	3788H	05-16-5993-8	09/09/16	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	Dayton	45431	1
Montgomery	3789H	05-16-8235-8	09/20/16	Disability	Failure to make reasonable accommodation	Administrative hearing ended - discrimination found	dayton	45417	1
Montgomery	3791H	05-17-8231-8	10/19/16	Disability	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation	Administrative hearing ended - discrimination found	Dayton		1
Montgomery	3793H	05-17-7451-8	10/26/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton	45402	1
Montgomery	3798H	05-17-8192-8	12/12/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45404	1
Montgomery	3799H	05-17-8193-8	12/14/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton		1
Montgomery	ADRH6(25621)04192016	05-16-4636-8	04/19/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Kettering	45440	1
Montgomery	ADRH6(25708)05232016	05-16-4935-8	05/23/16	Race	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Washington Township	45459	1
Montgomery	ADRH6(25709)05232016	05-16-4934-8	05/23/16	Race	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Washington Township	45459	1
Montgomery	DAYH6 (26112)12092016	05-17-6413-8	12/09/16	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Moraine	45439	1
Montgomery	DAYH6(25533)02292016	05-16-4619-8	02/29/16	Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Washington Twp.	45429	1
Montgomery	DAYH6(25582)03242016	05-16-4533-8	03/24/16	National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Riverside	45424	1
Montgomery	DAYH6(25609)04122016	05-16-4681-8	04/12/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Kettering	45429	1
Montgomery	DAYH6(25609)04122016	05-16-4932-8	04/12/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Kettering		1
Montgomery	DAYH6(25857)08162016	05-16-7354-8	08/16/16	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45416	1
Montgomery	DAYH6(25892)08262016	05-16-7929-8	08/26/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Englewood	45322	1
Montgomery	DAYH6(26114)12092016	05-17-6415-8	12/09/16	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Moraine	45439	1
Montgomery	TOLH6(25665)05052016	05-16-4698-8	05/05/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Huber Heights	45424	1

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Montgomery	TOLH6(25693)05162016	05-16-4837-8	05/16/16	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton	45419	1
Montgomery	TOLH6(25785)07072016	05-16-4948-8	07/07/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Moraine	45439	1
Montgomery	TOLH6(26054)11162016	05-17-0281-8	11/16/16	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton	45402	1
Muskingum	Total								1
Muskingum	COLH1(44299)06272016	05-16-4994-8	06/27/16	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Zanesville	43701	1
Ottawa	Total								2
Ottawa	TOLH2(37977)08252016	05-16-5413-8	08/25/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Oak Harbor	43449	1
Ottawa	TOLH2(38045)10032016	05-17-5756-8	10/03/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	Oak Harbor	43449	1
Pickaway	Total								2
Pickaway	COLH1(44049)01202016	05-16-4226-8	01/20/16	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Circleville	43113	1
Pickaway	DAYH1(44609)09232016	05-16-5470-8	09/23/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Circleville	43113	1
Portage	Total								4
Portage	ADRH3(38662)12022016	05-17-6611-8	12/02/16	Familial Status	Discriminatory advertisement - rental; Steering	Conciliation/settlement successful	Kent	44240	1
Portage	AKRH3(38471)07262016	05-16-5256-8	07/26/16	Disability	Failure to make reasonable accommodation	No cause determination	Streetsboro	44241	1
Portage	AKRH3(38559)09272016	05-16-5655-8	09/27/16	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Kent	44240	1
Portage	AKRH3(38578)10142016	05-17-6473-8	10/14/16	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Ravenna	44266	1
Putnam	Total								1
Putnam	TOLH2(38049)10172016	05-17-6072-8	10/17/16	National Origin	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Pandora	45877	1
Ross	Total								1
Ross	COLH1(44047)02102016	05-16-4332-8	02/10/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Chillicothe	45601	1
Scioto	Total								1
Scioto	DAYH6(26011)10132016	05-17-5693-8	10/13/16	Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Portsmouth	45662	1
Stark	Total								63
Stark	15-CNT-21	05-16-4190-8	01/08/16	Race, Color, National Origin, Sex, Religion, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44714	1
Stark	15-CNT-22	05-16-4255-8	01/26/16	Disability	Discrimination in services and facilities relating to rental	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-23	05-16-4289-8	02/01/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44710	1
Stark	15-CNT-24	05-16-4350-8	02/12/16	Race, Sex, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Canton	44705	1

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Stark	15-CNT-25	05-16-4349-8	02/12/16	Race, Disability	Discriminatory refusal to rent	Conciliation/settlement successful	Canton	44710	1
Stark	15-CNT-27	05-16-4353-8	02/18/16	Race	Discrimination in services and facilities relating to sale	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-28	05-16-4358-8	02/17/16	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-29	05-16-4412-8	03/03/16	Race, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental	Unable to locate complainant	Canton	44705	1
Stark	15-CNT-31	05-16-4516-8	04/06/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Canton	44708	1
Stark	15-CNT-32	05-16-4515-8	04/07/16	Race	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Canton	44703	1
Stark	15-CNT-33	05-16-4530-8	04/13/16	Sex	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-34	05-16-4578-8	04/15/16	Race	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44708	1
Stark	15-CNT-35	05-16-4645-8	04/29/16	Race, Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-36	05-16-4643-8	05/02/16	Sex, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-37	05-16-4653-8	05/02/16	National Origin	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44703	1
Stark	15-CNT-38	05-16-4697-8	05/16/16	Disability	Discriminatory refusal to rent; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-39	05-16-4712-8	05/19/16	Race, Disability	Discriminatory refusal to rent	Administrative hearing ended - discrimination found	Canton	44708	1
Stark	15-CNT-40	05-16-4729-8	05/23/16	Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44714	1
Stark	15-CNT-41	05-16-4769-8	06/08/16	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-42	05-16-4770-8	06/07/16	Race, Familial Status	Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44703	1
Stark	15-CNT-43	05-16-4777-8	06/09/16	Disability	Discriminatory refusal to rent	No cause determination	Canton	44702	1
Stark	15-CNT-44	05-16-4795-8	06/16/16	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44708	1
Stark	15-CNT-45	05-16-4801-8	06/20/16	Sex	Otherwise deny or make housing unavailable	No cause determination	Canton	44705	1
Stark	16-CNT-01	05-16-4862-8	07/05/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44704	1
Stark	16-CNT-02	05-16-4863-8	07/05/16	Sex	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44714	1
Stark	16-CNT-04	05-16-4877-8	07/07/16	Disability	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44705	1
Stark	16-CNT-05	05-16-4957-8	07/25/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44709	1

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Stark	16-CNT-06	05-16-5179-8	08/29/16	Race, Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Canton	44702	1
Stark	16-CNT-07	05-16-5170-8	09/01/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44709	1
Stark	16-CNT-08	05-16-5176-8	09/02/16	Race, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44705	1
Stark	16-CNT-09	05-16-5178-8	09/02/16	Race, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Unable to locate complainant	Canton	44705	1
Stark	16-CNT-10	05-16-5177-8	09/02/16	Race, Sex, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Unable to locate complainant	Canton		1
Stark	16-CNT-11	05-16-5180-8	08/30/16	Sex	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44706	1
Stark	16-CNT-12	05-16-5273-8	09/06/16	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44703	1
Stark	16-CNT-13	05-16-5312-8	09/09/16	Disability	Discriminatory advertising, statements and notices; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44703	1
Stark	16-CNT-14	05-16-5313-8	09/09/16	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Canton	44703	1
Stark	16-CNT-15	05-16-5350-8	09/15/16	Race, Disability, Retaliation	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44703	1
Stark	16-CNT-16	05-16-5431-8	09/22/16	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Canton	44708	1
Stark	16-CNT-17	05-16-5456-8	09/23/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44702	1
Stark	16-CNT-18	05-16-5512-8	09/27/16	Sex, Disability	Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44709	1
Stark	16-CNT-19	05-16-5618-8	09/29/16	Sex	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Canton	44705	1
Stark	16-CNT-20	05-17-5755-8	10/14/16	Familial Status	Discriminatory refusal to rent and negotiate for rental; Otherwise deny or make housing unavailable	Unable to locate complainant	Canton	44703	1
Stark	16-CNT-21	05-17-5754-8	10/14/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44706	1
Stark	16-CNT-22	05-17-5795-8	10/20/16	Race	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44706	1
Stark	16-CNT-23	05-17-5813-8	10/20/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44703	1
Stark	16-CNT-24	05-17-5914-8	10/28/16	Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Unable to locate complainant	Canton	44710	1
Stark	16-CNT-25	05-17-5933-8	10/28/16	Race, Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44710	1
Stark	16-CNT-26	05-17-5935-8	10/28/16	Race, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Unable to locate complainant	Canton	44705	1
Stark	16-CNT-27	05-17-5997-8	11/03/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44703	1
Stark	16-CNT-30	05-17-6232-8	11/18/16	Disability	Discriminatory advertising, statements and notices; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44710	1
Stark	16-CNT-31	05-17-6276-8	11/18/16	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44709	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									397
Stark	16-CNT-33	05-17-6396-8	12/05/16	Sex	Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable	No cause determination	Canton	44706	1
Stark	16-CNT-34	05-17-6401-8	12/09/16	Sex	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Canton	44710	1
Stark	16-CNT-35	05-17-6438-8	12/09/16	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44707	1
Stark	16-CNT-36	05-17-6493-8	12/16/16	Disability	Otherwise deny or make housing unavailable; Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44705	1
Stark	16-CNT-37	05-17-6494-8	12/19/16	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44703	1
Stark	16-CNT-38	05-17-6635-8	12/21/16	Disability	Discriminatory advertising, statements and notices; Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44710	1
Stark	AKRH3(38458)08012016	05-16-5454-8	08/01/16	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Massillon	44646	1
Stark	AKRH3(38528)09132016	05-16-5327-8	09/13/16	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Hartville	44632	1
Stark	CLEH3(38321)04192016	05-16-4562-8	04/19/16	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Canton	44707	1
Stark	CLEH4(43349)02292016	05-16-4621-8	02/29/16	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Not Selected	Uniontown	44685	1
Stark	CLEH4(43350)02292016	05-16-4622-8	02/29/16	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Not Selected	Uniontown	44685	1
Stark	CLEH4(43766)12292016	05-17-7014-8	12/29/16	Religion	Discriminatory refusal to rent	No cause determination	Alliance	44601	1
Summit	Total								29
Summit	ADRH3(38555)09232016	05-16-5792-8	09/23/16	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Mogadore	44260	1
Summit	ADRH3(38764)12192016	05-17-6498-8	12/19/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Akron	44320	1
Summit	ADRH3(38765)12192016	05-17-6497-8	12/19/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Akron	44320	1
Summit	AKR 38472	05-16-5254-8	05/22/16	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	Cuyahoga Falls	44221	1
Summit	AKRH1(44545)08302016	05-16-5758-8	08/30/16	Race	Discriminatory advertising, statements and notices; False denial or representation of availability - sale; Discrimination in the selling of residential real property	No cause determination	Northfield	44067	1
Summit	AKRH3(38203)01222016	05-16-4302-8	01/22/16	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Twinsburg	44087	1
Summit	AKRH3(38280)03222016	05-16-5513-8	03/22/16	Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44321	1
Summit	AKRH3(38305)04012016	05-16-4479-8	04/01/16	Race	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental	Dismissed for lack of jurisdiction	Akron	44305	1
Summit	AKRH3(38331)04252016	05-16-4638-8	04/25/16	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44314	1

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Total									397
Summit	AKRH3(38335)04282016	05-16-4945-8	04/28/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44314	1
Summit	AKRH3(38365)05202016	05-16-4842-8	05/20/16	Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44314	1
Summit	AKRH3(38366)05202016	05-16-4841-8	05/20/16	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44314	1
Summit	AKRH3(38489)08182016	05-16-5270-8	08/18/16	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44333	1
Summit	AKRH3(38524)09122016	05-16-5315-8	09/09/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44314	1
Summit	AKRH3(38525)09122016	05-16-5314-8	09/09/16	Disability	Failure to make reasonable accommodation	No cause determination	Akron	44314	1
Summit	AKRH3(38665)02052016	05-17-7194-8	12/05/16	Disability	Other discriminatory acts	Conciliation/settlement successful	Akron	44313	1
Summit	AKRH3(38722)02232016	05-17-7199-8	12/23/16	Race, Color	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44314	1
Summit	AKRH3(38766)12192016	05-17-6496-8	12/19/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Mogadore	44260	1
Summit	AKRH4(38204)01222015	05-16-4301-8	01/22/16	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	FHAP judicial consent order	Twinsburg	44087	1
Summit	AKRH4(43287)02292016	05-16-4399-8	02/29/16	Disability	Discrimination in terms and conditions of membership; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Twinsburg	44087	1
Summit	CLEH3(38362)05182016	05-16-6836-8	05/18/16	Disability, Retaliation	Discriminatory refusal to rent; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cuyahoga Falls	44221	1
Summit	CLEH3(38197)01152016	05-16-4295-8	01/15/16	Race, Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44314	1
Summit	CLEH3(38336)05022016	05-16-4661-8	05/02/16	Disability	Failure to provide accessible and usable public and common user areas	Conciliation/settlement successful	Akron		1
Summit	CLEH3(38377)06022016	05-16-7055-8	06/02/16	Disability	Failure to make reasonable accommodation	No cause determination	Akron	44308	1
Summit	CLEH3(38636)11142016	05-17-6613-8	11/14/16	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44320	1
Summit	CLEH4(43575)08302016	05-16-6008-8	08/30/16	Race	Discriminatory refusal to sell and negotiate for sale	No cause determination	Cuyahoga Falls	44223	1
Summit	HUD REQ WAIVER 7/27/16	05-16-4921-8	07/21/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44320	1
Summit	HUD REQ WAIVER 7/27/16	05-16-4923-8	07/07/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complainant failed to cooperate	Akron	44310	1
Summit	HUD REQ WAIVER 7/27/2016	05-16-4920-8	07/21/16	Disability	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44320	1
Trumbull	Total								4
Trumbull	AKRH3(38198)01192016	05-16-4329-8	01/19/16	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Hubbard	44425	1
Trumbull	AKRH4(43726)12062016	05-17-7074-8	12/06/16	Disability	Failure to make reasonable accommodation	No cause determination	Newton Falls	44444	1
Trumbull	CLEH3(38211)01272016	05-16-4304-8	01/27/16	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cortland	44410	1
Trumbull	CLEH4(43206)01152016	05-16-5441-8	01/15/16	Retaliation	Other discriminatory acts	No cause determination	Courtland	44410	1
Williams	Total								4
Williams	ADRH2(3762002162016	05-16-4338-8	02/16/16	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Complaint withdrawn by complainant after resolution	Bryan	43506	1

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Total									397
Williams	TOLH2(37535)01062016	05-16-4201-8	01/06/16	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Bryan	43506	1
Williams	TOLH2(37685)03232016	05-16-4444-8	03/23/16	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	Bryan	43506	1
Williams	TOLH2(38162)09202016	05-16-5430-8	09/20/16	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Edgerton	43517	1
Wood	Total								2
Wood	ADRH2(37891)07132016	05-16-4950-8	07/13/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Walbridge	43465	1
Wood	TOLH2(38066)10142016	05-17-5783-8	10/14/16	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complainant failed to cooperate	Rossford	43460	1



Development
Services Agency

Appendix 12

Resolution of Federal Housing Discrimination Complaints

January 1, 2017 to December 31, 2017

APPENDIX 12

Resolution of Federal Housing Discrimination Complaints in Ohio (1/1/17 - 12/31/17)

Data provided by the Ohio Civil Rights Commission

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									399
Allen	Total								4
Allen	DAYH6(J04122017	05-17-7718-8	04/12/17	Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Lima	45801	1
Allen	DAYH6(26629)08072 017	05-17-0607-8	08/07/17	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Use of discriminatory indicators		Elida		1
Allen	TOLH6(26172)01172 017	05-17-7801-8	01/07/17	Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Lima	45805	1
Allen	TOLH6(26658)04242 017	05-17-8751-8	07/21/17	Race	Discriminatory refusal to sell; Discrimination in terms/conditions/privileges relating to sale	No cause determination	Lima	45805	1
Ashland	Total								1
Ashland	DAYH6(26630)08102 017	05-17-2216-8	08/10/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Lima	45801	1
Ashtabula	Total								7
Ashtabula	ADRH4(44330)11092 017	05-18-0410-8	11/09/17	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Ashtabula	44004	1
Ashtabula	CLEH3(44099)04102 017	05-17-8437-8	06/13/17	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Failure to make reasonable accommodation		Geneva	44041	1
Ashtabula	CLEH4(J04182017	05-17-8391-8	06/13/17	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Kingsville	44048	1
Ashtabula	CLEH4(44101)04182 017	05-17-8497-8	06/22/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Kingsville	44048	1
Ashtabula	CLEH4(44210)09112 017	05-17-0750-8	09/11/17	Disability	Failure to make reasonable accommodation	No cause determination	Conneaut	44030	1
Ashtabula	CLEH4(44318)11062 017	05-18-2176-8	11/06/17	Race, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Ashtabula	44004	1
Ashtabula	COLH4(43959)04182 017	05-17-7772-8	04/18/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Ashtabula	44004	1
Athens	Total								3
Athens	ADRH1(45247)05242 017	05-17-8321-8	05/24/17	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Athens	45701	1
Athens	COLH1(44947)02032 017	05-17-8065-8	02/03/17	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	New Marshfield	45766	1
Athens	COLH1(45599)10182 017	05-18-9873-8	10/18/17	Disability, Retaliation	Failure to make reasonable accommodation	No cause determination	Athens	45701	1
Belmont	Total								1
Belmont	COLH1(45237)05232 017	05-17-8320-8	05/23/17	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Bellaire	43906	1
Butler	Total								6
Butler	DAYH6(26214)02032 017	05-17-0280-8	03/03/17	Race, Disability	Discriminatory refusal to rent; False denial or representation of availability; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Hamilton	45011-6218	1
Butler	DAYH6(26366)03282 017	05-17-7577-8	03/28/17	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Hamilton	45013	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									399
Butler	DAYH6(26416)05082017	05-17-0413-8	05/08/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	West Chester	45011	1
Butler	DAYH6(26659)07102017	05-17-8839-8	07/28/17	National Origin	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability	No cause determination	Hamilton	45015	1
Butler	HUD REQ WAIVER 2/2/2017	05-17-6991-8	02/01/17	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant without resolution	Mason	45040	1
Butler	HUD REQ WAIVER 2/2/2017	05-17-6992-8	02/01/17	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Steering	Complaint withdrawn by complainant without resolution	Mason	45040	1
Champaign	Total								1
Champaign	DAYH6(26699)08232017	05-17-9113-8	08/23/17	Race	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Urbana	43078	1
Clark	Total								1
Clark	DAYH6(26527)06282017	05-17-1151-8	06/28/17	Disability	Failure to permit reasonable modification	Complaint withdrawn by complainant after resolution	Springfield	45502	1
Columbiana	Total								5
Columbiana	ADRH3(39060)06222017	05-17-8534-8	06/22/17	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Salem	44460	1
Columbiana	ADRH3(39305)10272017	05-18-9763-8	10/27/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Salem	44460-2466	1
Columbiana	AKRH3(39164)09012017	05-17-9926-8	09/01/17	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Columbiana	44408	1
Columbiana	AKRH3(39232)10132017	05-18-9927-8	10/13/17	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbiana	44408	1
Columbiana	AKRH3(39264)10172017	05-18-9888-8	10/17/17	Disability	Failure to make reasonable accommodation	No cause determination	Salem	44460	1
Coshocton	Total								1
Coshocton	AKRH3(39022)05032017	05-17-8335-8	05/31/17	Disability	Discriminatory refusal to rent; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Coshocton	43812	1
Cuyahoga	Total								64
Cuyahoga	(CLE) H4 (43782) 01092017	05-17-7535-8	01/09/17	Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Parma	44134	1
Cuyahoga	ADRH3(43867)02222017	05-17-7377-8	02/22/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44144	1
Cuyahoga	ADRH4(43780)01092017	05-17-7012-8	01/09/17	Race, National Origin, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Strongsville	44136	1
Cuyahoga	ADRH4(43781)01092017	05-17-6971-8	01/09/17	Race, National Origin, Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Lyndhurst	44124	1
Cuyahoga	ADRH4(43832)02062017	05-17-7511-8	02/06/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	North Royalton	44133	1
Cuyahoga	ADRH4(43863)02212017	05-17-7571-8	02/21/17	National Origin, Familial Status	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Parma	44129	1
Cuyahoga	ADRH4(44018)05252017	05-17-8872-8	05/25/17	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44111	1
Cuyahoga	ADRH4(44061)06192017	05-17-9024-8	06/19/17	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Shaker Heights	44122	1
Cuyahoga	ADRH4(44073)06262017	05-17-8873-8	06/26/17	Race	Discriminatory refusal to rent; Steering	Complaint withdrawn by complainant after resolution	Parma	44134	1

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Total									399
Cuyahoga	ADRH4(44074)06262017	05-17-8874-8	06/26/17	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44111	1
Cuyahoga	ADRH4(44103)07132017	05-17-8879-8	07/13/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Lakewood	44107	1
Cuyahoga	ADRH4(44206)09072017	05-17-9615-8	09/07/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44113	1
Cuyahoga	ADRH4(44227)09212017	05-17-9620-8	09/21/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Lakewood	44107	1
Cuyahoga	ADRH4(44254)10052017	05-18-9906-8	10/05/17	Race, National Origin	Other discriminatory acts	Conciliation/settlement successful	Rocky River	44116	1
Cuyahoga	ADRH4(44417)12152017	05-18-0911-8	12/15/17	Disability	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution	Lakewood	44107	1
Cuyahoga	AKRH4(43788)01132017	05-17-8051-8	01/13/17	Disability	Failure to make reasonable accommodation	No cause determination	Euclid	44117	1
Cuyahoga	AKRH4(43791)01132017	05-17-8074-8	01/13/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	AKRH4(43793)01132017	05-17-8071-8	01/13/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	AKRH4(43800)01192017	05-17-7052-8	01/19/17	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Euclid	44123	1
Cuyahoga	AKRH4(44042)06072017	05-17-8542-8	06/07/17	Race, Familial Status	Steering	No cause determination	Cleveland	44144	1
Cuyahoga	AKRH4(44050)06122017	05-17-8652-8	06/12/17	Race, Familial Status	Discriminatory refusal to rent; False denial or representation of availability - rental; Other discriminatory acts	No cause determination	South Euclid	44121	1
Cuyahoga	AKRH4(44132)07072017	05-17-8672-8	07/17/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	No cause determination	West Lake	44145	1
Cuyahoga	AKRH4(44137)07132017	05-17-9174-8	07/13/17	Race, National Origin, Sex, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Lyndhurst	44124	1
Cuyahoga	AKRH4(44140)04132017	05-17-8821-8	07/27/17	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cleveland Heights	44106	1
Cuyahoga	AKRH4(44143)08072017	05-17-9755-8	08/07/17	Race, Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cleveland	44103	1
Cuyahoga	AKRH4(44153)08112017	05-17-9256-8	08/11/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Euclid	44143	1
Cuyahoga	CLEH4 (43779) 1092017	05-17-7736-8	01/09/17	Race, National Origin	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga	CLEH4(43899)03142017	05-17-8179-8	03/14/17	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Mayfield Heights	44124	1
Cuyahoga	CLEH4(43916)03212017	05-17-7692-8	03/21/17	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cleveland	44111	1
Cuyahoga	CLEH4(43927)03282017	05-17-0051-8	03/28/17	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cleveland	44115	1
Cuyahoga	CLEH4(43930)04032017	05-17-7716-8	04/03/17	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Conciliation/settlement successful	Garfield Heights	44125	1
Cuyahoga	CLEH4(43942)04032017	05-17-8063-8	04/03/17	Race	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Strongsville	44136	1
Cuyahoga	CLEH4(43997)05152017	05-17-9847-8	05/15/17	Disability	Failure to make reasonable accommodation	No cause determination	Cleveland	44135	1

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Total									399
Cuyahoga	CLEH4(44008)04132017	05-17-8089-8	05/16/17	Sex	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Cleveland Heights	44106	1
Cuyahoga	CLEH4(44055)06152017	05-17-9026-8	06/16/17	Disability	Discriminatory refusal to rent; Failure to permit reasonable modification	No cause determination	Euclid	44123	1
Cuyahoga	CLEH4(44058)06192017	05-17-9395-8	06/19/17	Disability	Failure to make reasonable accommodation	No cause determination	Garfield Heights	44134	1
Cuyahoga	CLEH4(44059)06192017	05-17-9394-8	06/19/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	Garfield Heights	44125	1
Cuyahoga	CLEH4(44060)06192017	05-17-9414-8	06/19/17	Color, National Origin, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Steering	Complaint withdrawn by complainant after resolution	Beachwood	44122	1
Cuyahoga	CLEH4(44105)05302017	05-17-9494-8	05/30/17	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44111	1
Cuyahoga	CLEH4(44118)07202017	05-17-9619-8	07/20/17	Disability	Failure to make reasonable accommodation	No cause determination	Maple Heights	44137	1
Cuyahoga	CLEH4(44195)08302017	05-17-0934-8	08/30/17	Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44105	1
Cuyahoga	CLEH4(44225)09202017	05-17-0017-8	09/20/17	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Orange Village	44022	1
Cuyahoga	CLEH4(44234)09222017	05-17-9714-8	09/22/17	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation		Westlake	44145	1
Cuyahoga	CLEH4(44252)10052017	05-18-9892-8	10/05/17	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Euclid	44123	1
Cuyahoga	CLEH4(44260)10102017	05-18-9715-8	10/10/17	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation		Westlake	44145	1
Cuyahoga	CLEH4(44262)06282017	05-17-9338-8	09/18/17	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Middleburg Heights	44130	1
Cuyahoga	CLEH4(44267)10172017	05-18-9824-8	10/17/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44114	1
Cuyahoga	CLEH4(44268)10172017	05-18-9825-8	10/17/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44114	1
Cuyahoga	CLEH4(44294)10252017	05-18-1755-8	10/25/17	Disability	Discriminatory refusal to rent	No cause determination	Maple Heights	44137	1
Cuyahoga	CLEH4(44308)11022017	05-18-2196-8	11/02/17	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Mayfield Heights	44124	1
Cuyahoga	CLEH4(44320)11072017	05-18-0084-8	11/07/17	Race	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cleveland	44135	1
Cuyahoga	CLEH4(44344)11212017	05-18-0267-8	11/21/17	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Parma	44130	1
Cuyahoga	CLEH4(44355)12012017	05-18-0574-8	12/01/17	Disability, Retaliation	Discriminatory refusal to rent	Conciliation/settlement successful	Euclid	44123	1
Cuyahoga	CLEH4(44361)10312017	05-18-9775-8	10/31/17	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Beachwood	44122	1
Cuyahoga	CLEH4(44386)12132017	05-18-1559-8	12/13/17	Disability, Retaliation	Failure to make reasonable accommodation	No cause determination	Garfield Heights	44125	1
Cuyahoga	CLEH4(44420)11172017	05-18-0444-8	11/17/17	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Lyndhurst	44124	1
Cuyahoga	FH-17-01	05-17-7612-8	04/03/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Shaker Heights	44122	1
Cuyahoga	FH-17-03	05-17-8032-8	05/09/17	Disability	Failure to make reasonable accommodation	No cause determination	Shaker Heights	44120	1
Cuyahoga	FH-17-04	05-18-9837-8	10/26/17	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Shaker Heights	44122	1

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Total									399
Cuyahoga	HUD REQ WAIVER 2/8/2017	05-17-7035-8	02/27/17	Disability	Discriminatory refusal to rent and negotiate for rental; Otherwise deny or make housing unavailable	No cause determination	Cleveland	44120	1
Cuyahoga	TOLH4 (44208)09112017	05-17-0565-8	09/11/17	Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44115	1
Cuyahoga	TOLH4(44287)10122017	05-18-9575-8	10/12/17	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant without resolution	Cleveland	44115	1
Cuyahoga		05-17-7493-8	03/20/17	Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44106	1
Cuyahoga		05-17-8015-8	05/10/17	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44113	1
Darke	Total								1
Darke	ADRH6(26595)07252017	05-17-0011-8	07/25/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Greenville	45331	1
Delaware	Total								2
Delaware	ADRH1(45331)07052017	05-17-8593-8	07/05/17	Race	Discriminatory refusal to sell; Discrimination in the selling of residential real property; Steering	Complaint withdrawn by complainant after resolution	Powell	43065	1
Delaware	COLH1(45212)05112017	05-17-8099-8	05/11/17	Familial Status	Discriminatory refusal to rent	No cause determination	Powell	43065	1
Erie	Total								4
Erie	AKRH3(38666)03062017	05-17-8076-8	03/06/17	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Sandusky	44870	1
Erie	AKRH3(38830)02212017	05-17-8075-8	02/21/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Sandusky	44870	1
Erie	AKRH3(39024)06012017	05-17-8402-8	06/01/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Sandusky	44870	1
Erie	AKRH4(44134)07092017	05-17-0571-8	07/09/17	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Sandusky	44870	1
Fairfield	Total								1
Fairfield	COLH1(45558)09292017	05-17-1003-8	09/29/17	Disability	Failure to make reasonable accommodation	No cause determination	Lancaster	43130	1
Franklin	Total								50
Franklin	ADRH1(44874)01132017	05-17-6773-8	01/13/17	Race, Retaliation	Discriminatory refusal to sell; Blockbusting - sale; Discrimination in the selling of residential real property; Discrimination in terms/conditions/privileges relating to sale; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Reynoldsburg	43068	1
Franklin	ADRH1(45189)05032017	05-17-8100-8	05/03/17	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Conciliation/settlement successful	Columbus	43202	1
Franklin	ADRH1(45244)05222017	05-17-8360-8	05/22/17	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Westerville	43081	1
Franklin	ADRH1(45363)06192017	05-17-8852-8	06/19/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Grove City	43123	1
Franklin	ADRH1(45461)09152017	05-17-0566-8	09/15/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Westerville	43081	1
Franklin	ADRH1(45597)10182017	05-18-9687-8	10/18/17	Disability, Retaliation	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Bexley	43209	1

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Total									399
Franklin	ADRH1(45700)12052017	05-18-0145-8	12/05/17	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Canal Winchester	43110	1
Franklin	CLEH1(45576)07172017	05-17-9333-8	09/15/17	Race, Sex, Disability, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43207	1
Franklin	CLEH1(45611)10232017	05-18-1211-8	10/23/17	Retaliation	Discriminatory refusal to rent	Conciliation/settlement successful	Bexley	43209	1
Franklin	COLH1(44911)01122017	05-17-6951-8	01/12/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Columbus	43223	1
Franklin	COLH1(44911)01262017	05-17-6933-8	01/26/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43222	1
Franklin	COLH1(44990)02212017	05-17-7211-8	02/21/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43201	1
Franklin	COLH1(44991)02242017	05-17-7254-8	02/24/17	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Columbus	43223	1
Franklin	COLH1(45070)02232017	05-17-7581-8	03/23/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	Conciliation/settlement successful	Bexley	43209	1
Franklin	COLH1(45100)04052017	05-17-7802-8	04/05/17	Race, National Origin, Disability	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Complaint withdrawn by complainant after resolution	Columbus	43215	1
Franklin	COLH1(45117)04112017	05-17-7872-8	04/11/17	Familial Status, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43231	1
Franklin	COLH1(45124)04132017	05-17-7737-8	04/13/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43223	1
Franklin	COLH1(45140)04202017	05-17-7816-8	04/20/17	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43201	1
Franklin	COLH1(45160)04232017	05-17-8093-8	04/23/17	Race	False denial or representation of availability - rental; Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	No cause determination	Columbus	43219	1
Franklin	COLH1(45168)04162017	05-17-8362-8	04/16/17	Race, National Origin, Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	No cause determination	Columbus	43231	1
Franklin	COLH1(45169)04102017	05-17-8062-8	04/10/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43220	1
Franklin	COLH1(45181)04232017	05-17-8479-8	04/23/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Athens	45701	1
Franklin	COLH1(45191)05042017	05-17-8064-8	05/04/17	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	Complaint withdrawn by complainant after resolution	Worthington	43085	1
Franklin	COLH1(45201)02272017	05-17-7378-8	02/27/17	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts		Columbus	43224	1
Franklin	COLH1(45256)06012017	05-17-8405-8	06/01/17	Disability, Retaliation	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Columbus	43206	1
Franklin	COLH1(45352)05082017	05-17-8563-8	06/29/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Galloway	43119	1
Franklin	COLH1(45353)06132017	05-17-8559-8	06/30/17	National Origin, Religion, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Hilliard	43026	1
Franklin	COLH1(45358)05052017	05-17-9017-8	08/05/17	Race, Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43224	1

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Greene	COLH6(26661)07152017	05-17-9760-8	07/15/17	Sex, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Yellow Springs	45387	1
Greene	DAYH6(26190)01202017	05-17-6837-8	01/20/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Beavercreek	45431	1
Greene	DAYH6(26266)02282017	05-17-2226-8	02/28/17	Race, Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Bellbrook	45305	1
Hamilton	Total								36
Hamilton	ADRH1(45515)09142017	05-17-9418-8	09/14/17	Familial Status	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Columbus	43220	1
Hamilton	ADRH6(26362)03242017	05-17-7538-8	03/24/17	Race	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Cincinnati	45219	1
Hamilton	ADRH6(26363)03242017	05-17-7539-8	03/24/17	Race	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45216	1
Hamilton	ADRH6(26364)04052017	05-17-7632-8	04/05/17	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45206	1
Hamilton	ADRH6(26566)04242017	05-17-8511-8	06/26/17	National Origin	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45211	1
Hamilton	ADRH6(26569)04202017	05-17-8213-8	05/30/17	Familial Status	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Cincinnati	45207	1
Hamilton	ADRH6(26572)04202017	05-17-8328-8	06/07/17	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Cincinnati	45207	1
Hamilton	ADRH6(26718)09062017	05-17-9255-8	09/06/17	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Reading	45215	1
Hamilton	ADRH6(26720)09062017	05-17-9254-8	09/06/17	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Reading	45215	1
Hamilton	CLEH6(26359)03132017	05-17-7394-8	03/13/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	No cause determination	Cincinnati	45237	1
Hamilton	CLEH6(26454)04142017	05-17-7995-8	05/05/17	Race	Discrimination in terms/conditions/privileges relating to sale	No cause determination	Cincinnati	45153	1
Hamilton	CLEH6(26460)03272017	05-17-8111-8	05/18/17	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cincinnati	45214	1
Hamilton	CLEH6(26571)04242017	05-17-8343-8	05/31/17	Familial Status	Discriminatory refusal to rent and negotiate for rental	No cause determination	Cincinnati	45224	1
Hamilton	CLEH6(26574)05032017	05-17-8494-8	06/22/17	Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Cincinnati	45205	1
Hamilton	CLEH6(26736)09262017	05-17-1400-8	09/26/17	Race	Discriminatory refusal to sell and negotiate for sale	No cause determination	Cincinnati	45229	1
Hamilton	DAYH6()04242017	05-17-8513-8	06/26/17	National Origin	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45211	1
Hamilton	DAYH6()06142017	05-17-8543-8	06/27/17	Sex	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Cincinnati	45251	1
Hamilton	DAYH6()09082017	05-17-9259-8	09/08/17	Disability, Familial Status	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Cincinnati	45255	1
Hamilton	DAYH6(26122)12092016	05-17-0414-8	05/17/17	Familial Status, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Steering; Otherwise deny or make housing unavailable	No cause determination	Cincinnati	45255	1

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Highland	CLEH6(26459)05232017	05-17-9232-8	05/23/17	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Hillsboro	45133	1
Hocking	Total								1
Hocking	COLH1(45631)1032017	05-18-9769-8	10/30/17	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Logan	43138	1
Holmes	Total								1
Holmes	AKRH3(39026)06022017	05-17-9759-8	06/02/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Millersburg	44654	1
Huron	Total								1
Huron	ADRH4(44033)06012017	05-17-8833-8	06/01/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Wakeman	44885	1
Jefferson	Total								3
Jefferson	AKRH3(38908)04032017	05-17-8174-8	04/03/17	Disability	Failure to make reasonable accommodation	No cause determination	Tiltonville	43963	1
Jefferson	AKRH3(39277)11132017	05-18-0573-8	11/13/17	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Wintersville	43953	1
Jefferson	AKRH3(39360)12112017	05-18-0067-8	12/11/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Steubenville	43952	1
Lake	Total								3
Lake	CLEH4(43957)04072017	05-17-7652-8	04/07/17	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Wickliffe	44094	1
Lake	CLEH4(43958)04122017	05-17-7739-8	04/12/17	Race, Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Painesville	44077	1
Lake	CLEH4(44102)05112017	05-17-8451-8	06/15/17	Disability	Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Panisville	44077	1
Licking	Total								2
Licking	COLH1(45132)04192017	05-17-7793-8	04/19/17	Race, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Other discriminatory acts	No cause determination	Newark	43055	1
Licking	COLH1(45403)07312017	05-17-8875-8	07/31/17	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Newark	43055	1
Logan	Total								1
Logan	DAYH6(26223)01302017	05-17-6939-8	01/30/17	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices	Dismissed for lack of jurisdiction	Bellefontaine	43311	1
Lorain	Total								8
Lorain	(CLE) H4 (43840)01252016	05-17-6876-8	01/25/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Lorain	44052	1
Lorain	ADRH4(43778)01092017	05-17-7651-8	01/09/17	Race, National Origin, Familial Status	Discriminatory advertisement - rental; Use of discriminatory indicators	Conciliation/settlement successful	Columbia Station	44028	1
Lorain	AKRH3(44093)07072017	05-17-9120-8	07/07/17	Sex, Religion	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	North Ridgeville	44039	1
Lorain	AKRH4(44136)07122017	05-17-9724-8	07/12/17	Race, Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Avon	44011	1
Lorain	CLEH4(44218)09182017	05-17-9890-8	09/18/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	No cause determination	North Ridgeville	44039	1

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Total									399
Lorain	CLEH4(44254)10062017	05-18-1544-8	10/06/17	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Elyria	44035	1
Lorain	CLEH4(44255)10262017	05-18-1543-8	10/06/17	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Elyria	44035	1
Lorain	CLEH4(44281)10232017	05-18-1527-8	10/23/17	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Lorain	44052	1
Lucas	Total								40
Lucas	ADRH2(38310)02172017	05-17-7198-8	02/17/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43613	1
Lucas	ADRH2(38329)03062017	05-17-7711-8	03/06/17	Race, Sex	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	Complaint withdrawn by complainant after resolution	Toledo	43615	1
Lucas	ADRH2(38390)04042017	05-17-7924-8	04/04/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Steering; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Toledo	43615	1
Lucas	ADRH2(38403)04062017	05-17-7923-8	04/06/17	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43608	1
Lucas	ADRH2(38485)05252017	05-17-4868-8	05/25/17	Sex, Disability	Discriminatory refusal to rent; Discriminatory refusal to negotiate for rental; Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43615	1
Lucas	ADRH2(38693)08312017	05-17-0576-8	08/31/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43697	1
Lucas	ADRH2(38775)10132017	05-18-0606-8	10/13/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43067	1
Lucas	ADRH2(38787)10202017	05-18-0373-8	10/20/17	Race, Color	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	Conciliation/settlement successful	Toledo	43607	1
Lucas	ADRH2(38789)10232017	05-18-0446-8	10/23/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43614	1
Lucas	CLEH2(38331)03092017	05-17-7735-8	03/09/17	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	Conciliation/settlement successful	Toledo	43605	1
Lucas	TOLH2 (38581)05182017	05-17-8432-8	06/15/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43612	1
Lucas	TOLH2((38663)08162017	05-17-0027-8	08/16/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43697-4369	1
Lucas	TOLH2(38308)02212017	05-17-7691-8	02/21/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Toledo	43604	1
Lucas	TOLH2(38309)01132017	05-17-7572-8	01/13/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43614	1
Lucas	TOLH2(38318)02272017	05-17-7693-8	02/27/17	Race	Discriminatory financing (includes real estate transactions); Discrimination in the purchasing of loans; Discrimination in the terms/conditions for making loans; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Toledo	43608	1
Lucas	TOLH2(38382)03292017	05-17-7752-8	03/29/17	Disability, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43614	1

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Total									399
Lucas	TOLH2(38383)03292017	05-17-7800-8	03/29/17	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43623	1
Lucas	TOLH2(38417)04142017	05-17-7751-8	04/14/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Holland	43528	1
Lucas	TOLH2(38423)04212017	05-17-8073-8	04/21/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Maumee	43537	1
Lucas	TOLH2(38428)02212017	05-17-7819-8	04/24/17	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Steering	No cause determination	Toledo	43604	1
Lucas	TOLH2(38439)04282017	05-17-8132-8	04/28/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Toledo	43623	1
Lucas	TOLH2(38448)05042017	05-17-8088-8	05/05/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to sale; Failure to make reasonable accommodation	No cause determination	Toledo	43615	1
Lucas	TOLH2(38486)05252017	05-17-2217-8	05/25/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	Toledo	43623	1
Lucas	TOLH2(38515)06122017	05-17-8855-8	06/12/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	No cause determination	Toledo	43613	1
Lucas	TOLH2(38537)06192017	05-17-8812-8	06/19/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Toledo	43611	1
Lucas	TOLH2(38581)09082017	05-17-9260-8	09/08/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Toledo	43604	1
Lucas	TOLH2(38582)02152017	05-17-8318-8	06/07/17	Race, Disability	Discriminatory refusal to negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Toledo	43614	1
Lucas	TOLH2(38597)06152017	05-17-9008-8	07/14/17	Race	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Toledo	43613	1
Lucas	TOLH2(38598)07152017	05-17-9121-8	07/15/17	Race, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Sylvania	43560	1
Lucas	TOLH2(38602)07202017	05-17-9834-8	07/20/17	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43623	1
Lucas	TOLH2(38624)07212017	05-17-8733-8	07/21/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Toledo	43614	1
Lucas	TOLH2(38625)07152017	05-17-9299-8	07/15/17	Race, Sex	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Toledo	43620	1
Lucas	TOLH2(38631)08032017	05-17-9117-8	08/03/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43614	1
Lucas	TOLH2(38748)10052017	05-18-1489-8	10/05/17	Race	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43614	1
Lucas	TOLH2(38785)10192017	05-18-1491-8	10/19/17	Sex	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)		Toledo	43606	1

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Total									399
Mercer	CLEH6(26418)05092017	05-17-9313-8	05/09/17	Race	Discriminatory refusal to rent	Conciliation/settlement successful	Celina	45822	1
Miami	Total								1
Miami	AKRH6(26650)08052017	05-17-9945-8	08/05/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Troy	45373	1
Monroe	Total								1
Monroe		05-17-8475-8	06/01/17	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Woodsfield	43793	1
Montgomery	Total								24
Montgomery	3800H	05-17-7236-8	01/04/17	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Dayton	45405	1
Montgomery	3801H	05-17-7679-8	01/17/17	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Dayton	45417	1
Montgomery	3802H	05-17-8234-8	02/17/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45402	1
Montgomery	3803H	05-17-7591-8	02/24/17	National Origin	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton		1
Montgomery	3804H	05-17-8245-8	03/02/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Dayton	45417	1
Montgomery	3809H	05-17-8238-8	05/18/17	Race	Discriminatory refusal to rent	No cause determination	Dayton	45402	1
Montgomery	3811H	05-17-8972-8	06/05/17	Race	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Dayton	45406	1
Montgomery	3812H	05-17-8731-8	06/29/17	Disability	Discriminatory refusal to negotiate for rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45405	1
Montgomery	ADRH6(26188)01062017	05-17-6672-8	01/06/17	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	West Carrollton	45449	1
Montgomery	ADRH6(26189)01062017	05-17-6673-8	01/06/17	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	West Carrollton	45449	1
Montgomery	ADRH6(26901)2042017	05-18-1088-8	12/04/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Miamisburg	45342	1
Montgomery	CLEH6(26540)06292017	05-17-0994-8	06/29/17	Disability	Discriminatory refusal to rent	No cause determination	Kettering	45419	1
Montgomery	CLEH6(26422)05102017	05-17-9762-8	05/10/17	Race, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Dayton	45404	1
Montgomery	CLEH6(26698)08082017	05-17-8932-8	08/08/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45410	1
Montgomery	CLEH6(26773)10102017	05-18-9931-8	10/10/17	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Dayton	45420	1
Montgomery	COLH6(26638)04062017	05-17-0417-8	04/06/17	Disability	Discriminatory refusal to rent	Conciliation/settlement successful	Ketterington	45409	1
Montgomery	DAYH6(26591)07242017	05-17-1135-8	07/24/17	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Dayton	45403	1
Montgomery	DAYH6(26222)01262017	05-17-6891-8	01/26/17	Sex, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Kettering	45429	1
Montgomery	DAYH6(26348)04142017	05-17-7873-8	04/14/17	Race, Disability	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Huber Heights	45424	1
Montgomery	DAYH6(26664)08092017	05-17-9415-8	08/09/17	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Other discriminatory acts	Complaint withdrawn by complainant without resolution	Germantown	45327	1
Montgomery	TOLH6(26146)01052017	05-17-0282-8	01/03/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Dayton	45415	1

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Total									399
Montgomery	TOLH6(26209)01312017	05-17-7930-8	01/31/17	Race	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Dayton		1
Montgomery	TOLH6(26304)03172017	05-17-2221-8	03/24/17	Race, Disability	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton	45415	1
Montgomery		05-18-9597-8	10/13/17	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Using ordinances to discriminate in zoning and land use		Dayton	45415	1
Morrow	Total								2
Morrow	COLH1(45135)03072017	05-17-7372-8	03/07/17	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Marengo	43334	1
Morrow	TOLH2(38823)11022017	05-18-0823-8	11/02/17	Familial Status	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Galion	44833	1
Perry	Total								1
Perry	COLH1(45465)08222017	05-17-9114-8	08/22/17	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Thornville	43076	1
Pickaway	Total								1
Pickaway	COLH1(45483)08152017	05-17-9015-8	08/15/17	Disability	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cicleville	43113	1
Portage	Total								9
Portage	AKR38910	05-17-9195-8	03/27/17	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Brimfield	44240	1
Portage	AKRH3(38837)02142017	05-17-7174-8	02/14/17	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Streetsboro	44241	1
Portage	AKRH3(38904)03192017	05-17-8066-8	03/31/17	Sex, Familial Status	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Kent	44240	1
Portage	AKRH3(38911)03272017	05-17-8960-8	03/27/17	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Brimfield	44240	1
Portage	AKRH3(39011)05182017	05-17-8431-8	05/25/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Kent	44240	1
Portage	AKRH3(39077)07062017	05-17-8832-8	07/06/17	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Ravenna	44266	1
Portage	AKRH3(39093)07032017	05-17-8612-8	07/10/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Brimfield	44240	1
Portage	AKRH3(39219)09282017	05-17-9704-8	09/28/17	Sex	Discriminatory refusal to rent and negotiate for rental	No cause determination	Ravenna	44266	1
Portage	AKRH3(39271)011082017	05-18-0274-8	11/08/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Kent	44240	1
Putnam	Total								1
Putnam	TOLH2(38345)03132017	05-17-7738-8	03/13/17	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Grove City	45830	1
Richland	Total								4
Richland	ADRH4(44248)09292017	05-17-9827-8	09/29/17	Race, Retaliation	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Shelby	44875	1

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Richland	CLEH4(44106)06302017	05-17-9580-8	06/30/17	Sex, Disability	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Mansfield	44902	1
Richland	CLEH4(44188)08252017	05-17-9905-8	08/25/17	Race	Discriminatory refusal to rent; False denial or representation of availability - rental	No cause determination	Mansfield	44907	1
Richland	CLEH4(44204)09052017	05-17-0882-8	09/05/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Mansfield	44901	1
Sandusky	Total								2
Sandusky	TOLH2(38422)04212017	05-17-8035-8	04/21/17	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Fremont	43420	1
Sandusky	TOLH2(38925)09082017	05-17-4895-8	09/08/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complainant failed to cooperate	Fremont	43420	1
Scioto	Total								1
Scioto	DAYH6(26774)06122017	05-17-9481-8	09/28/17	Race	Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Portsmouth	45662	1
Seneca	Total								2
Seneca	TOLH2(38498)06022017	05-17-2218-8	06/02/17	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	No cause determination	Tiffin	44883	1
Seneca	TOLH2(38661)08012017	05-17-9175-8	08/01/17	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental	Dismissed for lack of jurisdiction	Tiffin	44883	1
Stark	Total								31
Stark	16-CNT-40	05-17-6692-8	01/09/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	Unable to locate complainant	Canton	44710	1
Stark	16-CNT-41	05-17-6711-8	01/09/17	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44706	1
Stark	16-CNT-42	05-17-6752-8	01/12/17	Sex, Religion, Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44708	1
Stark	16-CNT-43	05-17-6983-8	02/01/17	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44703	1
Stark	16-CNT-44	05-17-7011-8	02/02/17	Disability	Discriminatory advertising, statements and notices; Failure to permit reasonable modification	No cause determination	Canton	44704	1
Stark	16-CNT-45	05-17-7076-8	02/08/17	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Canton	44702	1
Stark	16-CNT-46	05-17-7196-8	02/15/17	Disability	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44705	1
Stark	16-CNT-47	05-17-7234-8	02/21/17	Sex	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44710	1
Stark	16-CNT-48	05-17-7318-8	03/01/17	Disability	Discriminatory advertising, statements and notices; Failure to permit reasonable modification	Conciliation/settlement successful	Canton	44710	1
Stark	16-CNT-49	05-17-7774-8	04/17/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Canton	44707	1
Stark	16-CNT-50	05-17-8135-8	05/17/17	Sex, Familial Status	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44708	1
Stark	16-CNT-51	05-17-8253-8	06/01/17	Race, Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Unable to locate complainant	Canton	44707	1
Stark	16-CNT-52	05-17-8254-8	06/02/17	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44708	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									399
Stark	16-CNT-53	05-17-8336-8	06/08/17	Disability	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44703	1
Stark	17-CNT-01	05-17-8591-8	07/05/17	Race, Sex, Religion	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Canton	44708	1
Stark	17-CNT-02	05-17-8775-8	07/24/17	Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44703	1
Stark	17-CNT-03	05-17-9010-8	08/15/17	Race, Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Steering	No cause determination	Canton	44708	1
Stark	17-CNT-04	05-18-9577-8	10/09/17	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44709	1
Stark	17-CNT-05	05-18-9833-8	11/02/17	Race, Retaliation	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44708	1
Stark	17-CNT-06	05-18-9866-8	11/13/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44710	1
Stark	17-CNT-07	05-18-0016-8	12/01/17	Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Unable to locate respondent	Canton	44708	1
Stark	17-CNT-08	05-18-0265-8	12/27/17	Disability, Retaliation	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44703	1
Stark	AKRH3(38833)02222017	05-17-7812-8	02/22/17	Race, Sex, Familial Status	Discriminatory refusal to rent and negotiate for rental	No cause determination	Canton	44708	1
Stark	AKRH3(38912)03112017	05-17-0284-8	03/11/17	Race, Disability	Discriminatory refusal to negotiate for rental; False denial or representation of availability; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Canton	44702	1
Stark	AKRH3(39081)07102017	05-17-8653-8	07/10/17	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Massillon	44647	1
Stark	AKRH3(39089)07102017	05-17-8993-8	07/10/17	Disability	Failure to make reasonable accommodation	No cause determination	Canton	44702	1
Stark	AKRH3(39094)07132017	05-17-9002-8	07/13/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Louisville	44641	1
Stark	AKRH3(39123)06232017	05-17-8837-8	07/28/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44708	1
Stark	AKRH3(39149)08222017	05-17-9235-8	08/22/17	Disability	Failure to make reasonable accommodation	No cause determination	Canton	44709	1
Stark	AKRH3(39188)09122017	05-17-9682-8	09/12/17	Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Canton		1
Stark	TOLH3(39192)09162017	05-17-9536-8	09/16/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Alliance	44601	1
Summit	Total								31
Summit	ADRH3(38768)01242017	05-17-7639-8	01/24/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Akron	44314	1
Summit	ADRH3(38829)02212017	05-17-7312-8	02/21/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44314	1
Summit	ADRH3(38948)03272017	05-17-7554-8	03/27/17	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Akron	44304	1
Summit	ADRH3(39015)05262017	05-17-8553-8	05/26/17	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Akron	44685	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									399
Summit	ADRH3(39016)05262017	05-17-8552-8	05/26/17	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Akron	44306	1
Summit	ADRH3(39273)11092017	05-18-9889-8	11/09/17	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44313	1
Summit	AKR39262	05-17-0269-8	09/22/17	Sex, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44306	1
Summit	AKR39302	05-18-0591-8	12/02/17	Sex, Disability, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44306	1
Summit	AKRH3(38836)02162017	05-17-7201-8	02/16/17	Disability	Discrimination in the terms/conditions for making loans	No cause determination	Akron	44603	1
Summit	AKRH3(38949)03022017	05-17-7311-8	03/02/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Cuyahoga Falls	44223	1
Summit	AKRH3(38985)05092017	05-17-8131-8	05/09/17	Disability, Retaliation	Discrimination in services and facilities relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44304	1
Summit	AKRH3(39031)06052017	05-17-8410-8	06/05/17	Sex, Religion	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44302	1
Summit	AKRH3(39044)06132017	05-17-8474-8	06/13/17	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Twinsburg	44087	1
Summit	AKRH3(39050)06162017	05-17-8936-8	06/16/17	Sex, Religion, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44312	1
Summit	AKRH3(39085)07102017	05-17-9535-8	07/10/17	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Akron	44306	1
Summit	AKRH3(39142)08182017	05-17-9181-8	08/18/17	Sex, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Barberton	44203	1
Summit	AKRH3(39147)08212017	05-17-9683-8	08/21/17	Race, Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44320	1
Summit	AKRH3(39169)09062017	05-17-9680-8	09/06/17	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44302	1
Summit	AKRH3(39170)09062017	05-17-9736-8	09/06/17	Race, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Twinsburg	44087	1
Summit	AKRH3(39200)092017	05-17-9495-8	09/20/17	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Cuyahoga Falls	44221	1
Summit	AKRH3(39210)09222017	05-17-9681-8	09/22/17	Disability	Discriminatory refusal to negotiate for sale; Discrimination in the selling of residential real property; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	Akron	44306	1
Summit	AKRH3(39217)09272017	05-17-9499-8	09/27/17	Race, Disability	Failure to make reasonable accommodation	No cause determination	Akron	44320	1
Summit	AKRH3(39234)10162017	05-18-9695-8	10/16/17	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Fairlawn	44333	1
Summit	AKRH3(39256)11022017	05-18-9891-8	11/02/17	Race, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Akron	44313	1
Summit	AKRH3(39311)12062017	05-18-0249-8	12/06/17	Familial Status	Discriminatory refusal to rent; Discriminatory advertisement - rental	Conciliation/settlement successful	Akron	44301	1
Summit	CLEH3(38977)05042017	05-17-9152-8	05/04/17	Disability	Failure to make reasonable accommodation	No cause determination	Akron	44314	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									399
Summit	CLEH3(44025)05232017	05-17-9173-8	05/23/17	Disability	Failure to make reasonable accommodation	No cause determination	Akron	44314	1
Summit	CLEH4(43805)01232017	05-17-7471-8	01/23/17	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cuyahoga Falls	44221	1
Summit	Waive to HUD 10/24/2017	05-17-9692-8	09/19/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Cuyahoga Falls	44221	1
Summit	Waived to HUD 1/19/2018	05-17-9534-8	07/10/17	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Akron	44306	1
Summit	Waived to HUD 10/24/2017	05-18-9693-8	10/20/17	Disability	Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cuyahoga Falls	44221	1
Trumbull	Total								3
Trumbull	ADRH3(39074)07052017	05-17-8617-8	07/05/17	Disability	Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Vienna	44473	1
Trumbull	AKRH3(38739)01042017	05-17-2397-8	01/04/17	Race	Discriminatory acts under Section 818 (coercion, Etc.)		Warren	44481	1
Trumbull	AKRH3(39096)06042017	05-17-9035-8	06/04/17	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices	Conciliation/settlement successful	Niles	44446	1
Warren	Total								4
Warren	DAYH6()04112017	05-17-8154-8	05/24/17	Race	Discrimination in terms/conditions/privileges relating to sale	No cause determination	Mason	45014	1
Warren	DAYH6(26360)03102017	05-17-7379-8	03/10/17	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Lebanon	45036	1
Warren	DAYH6(26451)02132017	05-17-8056-8	05/15/17	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Springboro	45066	1
Warren	DAYH6(26883)10252017	05-18-9752-8	10/25/17	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution	Springboro	45066	1
Wayne	Total								2
Wayne	ADRH3(38845)01272017	05-17-7637-8	01/27/17	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Wooster	44691	1
Wayne	AKRH3(39272)11082017	05-18-0006-8	11/08/17	Race, National Origin, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Wooster	44691	1
Williams	Total								1
Williams	TOLH2(38837)11152017	05-18-0095-8	11/15/17	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	West Unity	43570	1
Wood	Total								6
Wood	ADRH2(38779)10162017	05-18-9776-8	10/16/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Bowling Green	43402	1
Wood	TOLH2(38237)01112017	05-17-7392-8	01/11/17	Disability	Failure to make reasonable accommodation	No cause determination	Rossford	43460-1456	1
Wood	TOLH2(38716)09192017	05-17-1488-8	09/19/17	Disability	Discrimination in the selling of residential real property; Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Perrysburg	43551	1
Wood	TOLH2(38829)11062017	05-18-1490-8	11/06/17	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Fostoria	44830	1

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Total									399
Wood	TOLH2(38889)12042017	05-18-0481-8	12/04/17	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Northwood	43619	1
Wood	TOLH2(38926)09172017	05-17-1744-8	09/19/17	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Fostoria	44830	1



Development
Services Agency

Appendix 13

Resolution of Federal Housing Discrimination Complaints

January 1, 2018 to December 31, 2018

APPENDIX 13

Resolution of Federal Housing Discrimination Complaints in Ohio (1/1/18 - 12/31/18)

Data provided by the Ohio Civil Rights Commission

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									493
Allen	Total								2
Allen	ADRH6(27214)04232018	05-18-1295-8	04/23/18	Race	Discriminatory terms, conditions, privileges, or services and facilities;	Conciliation/settlement successful	Lima	45804	1
Allen	DAY H6 (27435) 08062018	05-18-5571-8	08/06/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	Lima	45801	1
Ashland	Total								1
Ashland	CLEH4(44729)06262018	05-18-2319-8	06/26/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Ashland	44805	1
Ashtabula	Total								3
Ashtabula	ADRH4(44817) 07232018	05-18-2219-8	07/23/18	Disability	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Geneva	44041	1
Ashtabula	CLEH4(44725)06142018	05-18-1827-8	06/14/18	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Ashtabula	44004	1
Ashtabula	CLEH4(45157)07232018	05-18-2220-8	07/23/18	Disability	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Geneva	44041	1
Athens	Total								2
Athens	ADRH1(46052)05072018	05-18-1426-8	05/07/18	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant after resolution	The Plains	45780	1
Athens	ADRH1(46176)06152018	05-18-1903-8	06/15/18	Sex, Disability	Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Athens	45701	1
Auglaize	Total								1
Auglaize	DAYH6(27648)11012018	05-19-3433-8	11/01/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	St. Marys	45885	1
Belmont	Total								2
Belmont	ADRH1(46099)05132018	05-18-1907-8	06/13/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Martins Ferry	43935	1
Belmont		05-18-1553-8	05/22/18	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Complainant failed to cooperate	Martins Ferry	43935	1
Butler	Total								10
Butler	ADRH6(27610)10252018	05-19-3263-8	10/25/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Hamilton	45011	1
Butler	CLEH4(27660)11162018	05-19-3927-8	11/16/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Hamilton	47012	1
Butler	CLEH6(27540)10022018	05-19-4197-8	10/02/18	Race, Sex, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	No cause determination	Fairfield	45014	1
Butler	DAY H6 (27321) 05242018	05-18-1583-8	05/24/18	Sex, Familial Status	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Oxford	45056	1
Butler	DAYH6()08172018	05-18-2581-8	08/17/18	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Middletown	45044	1
Butler	DAYH6(27216)04242018	05-18-1313-8	04/24/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Complainant failed to cooperate	Hamilton	45013	1
Butler	DAYH6(27287)06022018	05-18-4548-8	06/02/18	Disability	Failure to make reasonable accommodation	No cause determination	Hamilton	45013	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									493
Butler	DAYH6(27325)06052018	05-18-1726-8	06/05/18	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	FHAP judicial dismissal	Hamilton	45013	1
Butler	DAYH6(27552)09192018	05-18-2939-8	09/19/18	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Fairfield	45014	1
Butler	TOLH6(27719)12182018	05-19-3756-8	12/13/18	National Origin	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Hamilton	45011	1
Clark	Total								1
Clark	TOLH6(27124)03062018	05-18-0862-8	03/06/18	Familial Status	Discriminatory advertising, statements and notices; Discrimination in the terms/conditions for making loans		Springfield	45504	1
Clermont	Total								1
Clermont	DAYH6(27502)08292018	05-18-2742-8	08/29/18	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Milford	45150	1
Clinton	Total								1
Clinton	DAYH6(27553)09132018	05-18-2850-8	09/13/18	Disability	Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Wilmington	45177	1
Columbiana	Total								1
Columbiana	CLEH4(44445)01232018	05-18-0971-8	01/23/18	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Salem	44460	1
Crawford	Total								2
Crawford	ADRH2(39189)05012018	05-18-1376-8	05/01/18	Race, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Bucyrus	44820	1
Crawford	CLEH4(44724)06202018	05-18-1885-8	06/20/18	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable	No cause determination	Cleveland	44108	1
Cuyahoga	Total								89
Cuyahoga	(CLE) H4 (44441) 01222018	05-18-0880-8	01/22/18	Disability, Retaliation	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Parma	44134	1
Cuyahoga	(CLE) H4 (44477) 02122018	05-18-2076-8	02/12/18	Disability	Failure to make reasonable accommodation	No cause determination	Avon	44011	1
Cuyahoga	(CLE) H4 (44493) 02212018	05-18-2105-8	02/21/18	Sex, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44102	1
Cuyahoga	(CLE) H4 (44912) 10122018	05-19-3584-8	10/12/18	Disability	Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Cleveland	44115	1
Cuyahoga	(CLE)H4(44963)11092018	05-19-4135-8	11/09/18	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Lakewood	44107	1
Cuyahoga	(CLE)H4(44982)11212018	05-19-4033-8	11/21/18	Disability	Discriminatory refusal to rent	No cause determination	Cleveland	44111	1
Cuyahoga	(CLE)H4(44989)11302018	05-19-4285-8	11/30/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Bedford	44146	1
Cuyahoga	ADRH4(44430)01182018	05-18-0914-8	01/18/18	National Origin, Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Broadview Heights	44147	1
Cuyahoga	ADRH4(44482)02152018	05-18-0922-8	02/15/18	Race, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in services and facilities relating to rental	Conciliation/settlement successful	Rocky River	44116	1
Cuyahoga	ADRH4(44484)02162018	05-18-1607-8	02/16/18	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	North Olmsted	44070	1
Cuyahoga	ADRH4(44543)03212018	05-18-1560-8	03/21/18	Familial Status, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Beachwood	44122	1

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Total									493
Cuyahoga	ADRH4(44549)03272018	05-18-1568-8	03/27/18	National Origin, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cleveland	44134	1
Cuyahoga	ADRH4(44573)04102018	05-18-1646-8	04/10/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	North Royalton	44133	1
Cuyahoga	ADRH4(44576)04102018	05-18-1603-8	04/10/18	Race, Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Lakewood	44107	1
Cuyahoga	ADRH4(44584)04132018	05-18-1754-8	04/13/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44115	1
Cuyahoga	ADRH4(44614)04302018	05-18-1556-8	04/30/18	Race, Color, National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant without resolution	Cleveland	44102	1
Cuyahoga	ADRH4(44705)06182018	05-18-2286-8	06/18/18	Race, Sex, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant without resolution	Euclid	44123	1
Cuyahoga	ADRH4(44768)07232018	05-18-2756-8	07/23/18	Race	Discriminatory refusal to rent	Conciliation/settlement successful	Cleveland	44111	1
Cuyahoga	ADRH4(44822)08232018	05-18-2771-8	08/23/18	Race	Discriminatory refusal to rent	Conciliation/settlement successful	South Euclid	44121	1
Cuyahoga	ADRH4(44854)09112018	05-18-2840-8	09/11/18	Race	Discriminatory refusal to rent	Conciliation/settlement successful	Cleveland Heights	44118	1
Cuyahoga	ADRH4(44860)09142018	05-18-2897-8	09/14/18	Race	Discriminatory refusal to rent	Conciliation/settlement successful	Shaker Heights	44122	1
Cuyahoga	ADRH4(44910)10112018	05-19-3259-8	10/11/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Lakewood	44107	1
Cuyahoga	ADRH4(45030)12192018	05-19-4283-8	12/19/18	Race, Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Warrensville Heights	44128	1
Cuyahoga	AKRH3(39727)08132018	05-18-2796-8	08/13/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44125	1
Cuyahoga	CLEH4(44475)02092018	05-18-0921-8	02/09/18	Sex, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Rocky River	44116	1
Cuyahoga	CLEH4()01222018	05-18-0596-8	01/22/18	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44113	1
Cuyahoga	CLEH4()01222018	05-18-0597-8	01/22/18	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44113	1
Cuyahoga	CLEH4(44408)01032018	05-18-2719-8	01/03/18	Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Westlake	44145	1
Cuyahoga	CLEH4(44426)01032018	05-18-0324-8	01/03/18	Race, Religion	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Beachwood	44122	1
Cuyahoga	CLEH4(44447)01242018	05-18-2818-8	01/24/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Oakwood Village	44146	1
Cuyahoga	CLEH4(44450)01172018	05-18-0464-8	01/17/18	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Cleveland	44104	1
Cuyahoga	CLEH4(44461)02022018	05-18-1563-8	02/02/18	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Lakewood	44107	1
Cuyahoga	CLEH4(44467)01292018	05-18-0544-8	01/29/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Lakewood	44107	1
Cuyahoga	CLEH4(44468)01192018	05-18-1723-8	01/19/18	Race	Discriminatory refusal to rent	No cause determination	Solon	44139	1
Cuyahoga	CLEH4(44511)02272018	05-18-0978-8	02/27/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	Cleveland	44113	1

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Cuyahoga	CLEH4(44532)03132018	05-18-3098-8	03/13/18	Race, Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Parma	44129	1
Cuyahoga	CLEH4(44557)03212018	05-18-0976-8	03/21/18	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44104	1
Cuyahoga	CLEH4(44559)02082018	05-18-0671-8	02/08/18	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	Euclid,	44132	1
Cuyahoga	CLEH4(44564)03302018	05-18-2098-8	03/30/18	Race	Discrimination in the selling of residential real property	No cause determination	Brecksville	44141	1
Cuyahoga	CLEH4(44605)04242018	05-18-2298-8	04/24/18	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Berea	44017	1
Cuyahoga	CLEH4(44625)04102018	05-18-1199-8	04/10/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Findlay	45840	1
Cuyahoga	CLEH4(44627)04052018	05-18-1153-8	04/05/18	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Parma	44130	1
Cuyahoga	CLEH4(44628)04172018	05-18-1255-8	04/17/18	Sex, Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44112	1
Cuyahoga	CLEH4(44631)05042018	05-18-1415-8	05/04/18	Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Cleveland	44102	1
Cuyahoga	CLEH4(44662)05252018	05-18-2777-8	05/25/18	Race, Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Cleveland	44111	1
Cuyahoga	CLEH4(44689)06122018	05-18-2100-8	06/12/18	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Cleveland	44106	1
Cuyahoga	CLEH4(44702)06152018	05-18-2764-8	06/15/18	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Cleveland	44105	1
Cuyahoga	CLEH4(44704)06182018	05-18-3299-8	06/18/18	Retaliation	Discriminatory refusal to rent	No cause determination	Cleveland	44102	1
Cuyahoga	CLEH4(44709)06152018	05-18-2739-8	08/15/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Warrensville Heights	44128	1
Cuyahoga	CLEH4(44753)07172018	05-18-2178-8	07/17/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	North Olmsted	44070	1
Cuyahoga	CLEH4(44772)07262018	05-18-3356-8	07/26/18	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga	CLEH4(44779)07312018	05-18-3847-8	07/31/18	Religion, Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	No cause determination	Rocky River	44116	1
Cuyahoga	CLEH4(44802)08152018	05-18-2772-8	08/15/18	Race	Discriminatory refusal to rent	Conciliation/settlement successful	South Euclid	44121	1
Cuyahoga	CLEH4(44808)08172018	05-18-3174-8	08/17/18	National Origin, Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga	CLEH4(44816)07262018	05-18-2279-8	07/26/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Lyndhurst	44124	1
Cuyahoga	CLEH4(44836)08312018	05-18-3142-8	08/31/18	Disability, Retaliation	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Cleveland	44127	1
Cuyahoga	CLEH4(44858)09132018	05-18-3499-8	09/13/18	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	University Heights	44121	1
Cuyahoga	CLEH4(44861)09172018	05-18-4490-8	09/17/18	Race	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	North Olmsted	44070	1
Cuyahoga	CLEH4(44867)09242018	05-18-3105-8	09/24/18	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44102	1
Cuyahoga	CLEH4(44870)09242018	05-18-3987-8	09/24/18	Race, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland Heights	44118	1
Cuyahoga	CLEH4(44871)09242018	05-18-3986-8	09/24/18	Race, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland Heights	44118	1

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Cuyahoga	CLEH4(44877)09252018	05-18-3144-8	09/25/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44106	1
Cuyahoga	CLEH4(44897)08292018	05-18-2743-8	08/29/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cleveland Heights	44118	1
Cuyahoga	CLEH4(44899)09182018	05-18-2896-8	09/18/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cleveland	44102	1
Cuyahoga	CLEH4(44900)09202018	05-18-2945-8	09/20/18	National Origin, Religion	Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Rocky River	44116	1
Cuyahoga	CLEH4(44904)10052018	05-19-3758-8	10/05/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Rocky River	44116	1
Cuyahoga	CLEH4(44909)10112018	05-19-3918-8	10/11/18	Religion, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Cleveland	44109	1
Cuyahoga	CLEH4(44932)10222018	05-19-3764-8	10/22/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44108	1
Cuyahoga	CLEH4(44936)10242018	05-19-4108-8	10/24/18	Disability, Retaliation	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Warrensville Heights	44128	1
Cuyahoga	CLEH4(44952)08152018	05-19-3347-8	11/01/18	Race, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	Euclid	44117	1
Cuyahoga	CLEH4(44957)11062018	05-19-3946-8	11/06/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	No cause determination	Cleveland	44102	1
Cuyahoga	CLEH4(44964)11082018	05-19-3420-8	11/08/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Dismissed for lack of jurisdiction	CLEVELAND	44111	1
Cuyahoga	CLEH4(44968)11072018	05-19-3759-8	11/07/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Rocky River	44116	1
Cuyahoga	CLEH4(44981)11192018	05-19-3507-8	11/19/18	Race, Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Strongsville	44136	1
Cuyahoga	CLEH4(44999)09252018	05-19-3577-8	12/03/18	Race, Sex	Discrimination in the making of loans	No cause determination	Mayfield Heights	44124	1
Cuyahoga	CLEH4(45002)12062018	05-19-4295-8	12/06/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44104	1
Cuyahoga	CLEH4(45011)12112018	05-19-4287-8	12/11/18	Disability	Failure to make reasonable accommodation	No cause determination	Euclid	44123	1
Cuyahoga	COLH1(46274)07052018	05-18-1997-8	07/05/18	Race	Discriminatory refusal to rent	Dismissed for lack of jurisdiction	Gahanna	43230	1
Cuyahoga	TOLH4(44778)07312018	05-18-3657-8	07/31/18	Race, Sex, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44115	1
Cuyahoga	TOLH4(44955)11022018	05-19-4306-8	11/02/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Toledo	44115	1
Cuyahoga		05-18-0860-8	01/16/18	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44113	1
Cuyahoga		05-18-0918-8	01/16/18	Disability	Non-compliance with design and construction requirements (handicap)	Complaint withdrawn by complainant without resolution	Cleveland	44113	1
Cuyahoga		05-18-0919-8	01/16/18	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44113	1
Cuyahoga		05-19-3597-8	10/31/18	Disability	Non-compliance with design and construction requirements (handicap)		Cleveland	44113	1
Cuyahoga		05-19-3598-8	10/31/18	Disability	Non-compliance with design and construction requirements (handicap)		Cleveland	44113	1
Cuyahoga		05-19-3599-8	10/31/18	Disability	Non-compliance with design and construction requirements (handicap)		Cleveland	44113	1
Cuyahoga		05-19-3600-8	10/31/18	Disability	Non-compliance with design and construction requirements (handicap)		Cleveland	44113	1

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Cuyahoga		05-19-3601-8	10/31/18	Disability	Non-compliance with design and construction requirements (handicap)		Cleveland	44113	1
Cuyahoga		05-19-3602-8	10/31/18	Disability	Non-compliance with design and construction requirements (handicap)		Cleveland	44113	1
Darke	Total								1
Darke	DAY H6 (27653) 11192018	05-19-4397-8	11/19/18	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation		Greenville	45331	1
Defiance	Total								2
Defiance	DAYH6(27088)03142 018	05-18-1212-8	03/14/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Arcanum	45304	1
Defiance	TOLH2(39559)11072 018	05-19-3906-8	11/07/18	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Defiance	43512	1
Delaware	Total								3
Delaware	COLH1(45922)03132 018	05-18-1277-8	03/13/18	Disability	Failure to make reasonable accommodation	No cause determination	Lewis Center	43025	1
Delaware	COLH1(45994)04062 018	05-18-1197-8	04/06/18	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Lewis Center	43035	1
Delaware	COLH1(46685)12202 018	05-19-3830-8	12/20/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Sunbury	43074	1
Fairfield	Total								4
Fairfield	COLH1()09242018	05-18-2981-8	09/24/18	Disability	Discriminatory refusal to rent		Lancaster	43130	1
Fairfield	COLH1(46105)05152 018	05-18-1611-8	05/15/18	Race	Discriminatory refusal to sell; False denial or representation of availability - sale; Discriminatory financing (includes real estate transactions); Discrimination in the selling of residential real property	No cause determination	Lancaster	43130	1
Fairfield	COLH1(46197)06222 018	05-18-2648-8	06/22/18	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Pickerington	43147	1
Fairfield	COLH1(46277)07232 018	05-18-2285-8	07/23/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Canal Winchester	43110	1
Franklin	Total								46
Franklin	ADRH1(45759)01022 018	05-18-0407-8	01/02/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43223	1
Franklin	ADRH1(45847)02052 018	05-18-0718-8	02/05/18	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Grove City	43123	1
Franklin	ADRH1(45862)02032 018	05-18-0717-8	02/03/18	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Westerville	43081	1
Franklin	ADRH1(45992)04052 018	05-18-1194-8	04/05/18	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Columbus	43232	1
Franklin	ADRH1(46153)06052 018	05-18-2293-8	06/05/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43219	1
Franklin	ADRH1(46358)08172 018	05-18-2639-8	08/17/18	Race, National Origin, Religion, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Columbus	43228	1
Franklin	ADRH1(46531)10232 018	05-19-4485-8	10/23/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Reynoldsburg	43068	1
Franklin	ADRH1(46562)11022 018	05-19-3381-8	11/02/18	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Columbus	43224	1
Franklin	ADRH1(46656)12102 018	05-19-3866-8	12/10/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43235	1
Franklin	COLH1(45850)01272 018	05-18-2116-8	01/27/18	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Grandview	43212	1

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Franklin	COLH1(45861)02122018	05-18-0705-8	02/12/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43232	1
Franklin	COLH1(45965)03222018	05-18-0995-8	03/22/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43229	1
Franklin	COLH1(45966)03222018	05-18-0992-8	03/22/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43229	1
Franklin	COLH1(45983)04022018	05-18-1115-8	04/02/18	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Upper Arlington	43220	1
Franklin	COLH1(46007)04112018	05-18-1291-8	04/11/18	Race, National Origin, Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Columbus	43230	1
Franklin	COLH1(46026)04172018	05-18-1253-8	04/17/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43232	1
Franklin	COLH1(46064)05022018	05-18-1401-8	05/02/18	Disability	Failure to make reasonable accommodation	No cause determination	Columbus	43227	1
Franklin	COLH1(46067)05022018	05-18-1528-8	05/02/18	Disability	Discriminatory refusal to rent	No cause determination	Columbus	43213	1
Franklin	COLH1(46086)05022018	05-18-1396-8	05/02/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Columbus	43201	1
Franklin	COLH1(46124)05222018	05-18-1645-8	05/22/18	Race, Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Gahanna	43230	1
Franklin	COLH1(46175)05212018	05-18-1546-8	05/21/18	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Columbus	43212	1
Franklin	COLH1(46200)06252018	05-18-2119-8	06/25/18	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Columbus	43209	1
Franklin	COLH1(46202)06252018	05-18-2117-8	06/25/18	Race, Religion	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43207	1
Franklin	COLH1(46252)07132018	05-18-2157-8	07/13/18	Sex, Disability	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43235	1
Franklin	COLH1(46271)07092018	05-18-2018-8	07/09/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Columbus	43228	1
Franklin	COLH1(46311)08012018	05-18-2460-8	08/01/18	Race, Sex, Retaliation	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Reynoldsburg	43068	1
Franklin	COLH1(46323)08062018	05-18-5051-8	08/06/18	Race	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	Worthington	43085	1
Franklin	COLH1(46324)08062018	05-18-5050-8	08/06/18	Race	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	Worthington	43085	1
Franklin	COLH1(46364)08202018	05-18-2640-8	08/20/18	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43205	1
Franklin	COLH1(46373)08082018	05-18-2476-8	08/08/18	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Gahanna	43230	1
Franklin	COLH1(46374)08082018	05-18-2477-8	08/08/18	Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43201	1
Franklin	COLH1(46375)08142018	05-18-2518-8	08/14/18	Race	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43227	1
Franklin	COLH1(46426)09122018	05-18-5495-8	09/12/18	Sex, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43229	1

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Total									493
Franklin	COLH1(46447)09202018	05-18-2950-8	09/20/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Columbus	43219	1
Franklin	COLH1(46464)09262018	05-18-3072-8	09/26/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43232	1
Franklin	COLH1(46528)10222018	05-19-3357-8	10/22/18	Disability	Failure to permit reasonable modification	No cause determination	Canal Winchester	43110	1
Franklin	COLH1(46578)11062018	05-19-3399-8	11/06/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Columbus	43302	1
Franklin	COLH1(46594)11122018	05-19-3896-8	11/12/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Columbus	43232	1
Franklin	COLH1(46613)11192018	05-19-3508-8	11/19/18	Race, Sex, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Steering	No cause determination	Dublin	43016	1
Franklin	COLH1(46621)11272018	05-19-3761-8	11/27/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Whitehall	43213	1
Franklin	COLH1(46641)11292018	05-19-3572-8	11/29/18	Race, Sex	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43211	1
Franklin	COLH1(46642)11302018	05-19-3579-8	11/30/18	National Origin, Sex	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43213	1
Franklin	COLH1(46653)12132018	05-19-3762-8	12/13/18	Race	Discriminatory financing (includes real estate transactions)	No cause determination	Columbus	43205	1
Franklin	COLH1(46658)12112018	05-19-3868-8	12/11/18	Race, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43229	1
Franklin	COLH1(46666)12122018	05-19-3748-8	12/12/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43202	1
Franklin	COLH1(46687)12272018	05-19-4090-8	12/27/18	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Galloway	43119	1
Fulton	Total								2
Fulton	ADRH2(39455)09142018	05-18-3627-8	09/14/18	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Delta	43515	1
Fulton	TOLH2(39009)02062018	05-18-1204-8	02/06/18	Color, National Origin, Religion, Disability	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Swanton	43558	1
Geauga	Total								3
Geauga	ADRH4(44540)03192018	05-18-1612-8	03/19/18	Race	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Burton	44021	1
Geauga	CLEH4(44550)03272018	05-18-3523-8	03/27/18	National Origin	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Chardon	44024	1
Geauga	WAIVED TO HUD 4/26/2018	05-18-1273-8	04/17/18	Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Unable to locate complainant	Chardon	44024	1
Greene	Total								6
Greene	(CLE)H6(27562)10122018	05-19-4530-8	10/12/18	Disability	Failure to make reasonable accommodation	No cause determination	Cedarville	45314	1
Greene	DAY H6 (26974) 01182018	05-18-1314-8	01/18/18	Race, Sex	Discriminatory refusal to rent; Discrimination in services and facilities relating to rental; Otherwise deny or make housing unavailable; Other discriminatory acts; Use of discriminatory indicators	No cause determination	Xenia	45385	1
Greene	DAYH6(27324)06052018	05-18-1724-8	06/05/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Beavercreek	45431	1

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Greene	DAYH6(27397)07052018	05-18-1998-8	07/05/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Xenia	45385	1
Greene	DAYH6(27675)11262018	05-19-6099-8	11/28/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation		Beavercreek	45434	1
Greene	TOLH6(27684)12032018	05-19-4106-8	12/03/18	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Xenia	45385	1
Guernsey	Total								1
Guernsey	COLH1(46220)06282018	05-18-2096-8	06/28/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Cambridge	43725	1
Hamilton	Total								47
Hamilton	ADRH6()09242018	05-18-2980-8	09/24/18	Familial Status	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45247	1
Hamilton	ADRH6(26985)01192018	05-18-0483-8	01/19/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Cincinnati	45231	1
Hamilton	ADRH6(27555)09242018	05-18-2979-8	09/24/18	Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Cincinnati	45237	1
Hamilton	ADRH6(27609)10252018	05-19-3262-8	10/25/18	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices	Conciliation/settlement successful	Cincinnati	45229	1
Hamilton	ADRH6(27631)11062018	05-19-3401-8	11/06/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45224	1
Hamilton	ADRH6(27657)11192018	05-19-3509-8	11/19/18	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Cincinnati	45248	1
Hamilton	ADRH6(27693)11282018	05-19-3558-8	11/28/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Cincinnati	45247	1
Hamilton	CLEH6(27616)09252018	05-19-3171-8	10/17/18	Disability	Discriminatory refusal to rent; Failure to permit reasonable modification		Cincinnati	45237	1
Hamilton	CLEH6(27620)10292018	05-19-3301-8	10/29/18	Sex, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Cincinnati	45229	1
Hamilton	DAY H6 (27209) 05072019	05-18-5068-8	05/07/18	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	No cause determination	Springdale	45246	1
Hamilton	DAY H6 (27404) 07232018	05-18-4494-8	07/23/18	Disability	Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cincinnati		1
Hamilton	DAY H6 (27490) 09042018	05-18-3636-8	09/04/18	Sex	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification	No cause determination	Cincinnati	45211	1
Hamilton	DAY H6 (27571) 10152018	05-19-4496-8	10/15/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to provide an accessible building entrance; Other non-compliance with design and construction requirements; Failure to make reasonable accommodation		Cincinnati	45211	1
Hamilton	DAY H6 (46491) 10092018	05-19-6255-8	10/09/18	Race, Sex	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertisement - rental	No cause determination	Cincinnati	45237	1
Hamilton	DAYH6 (27163) 04/11/2018	05-18-1215-8	04/11/18	Disability	Failure to make reasonable accommodation	No cause determination	Harrison	45030	1
Hamilton	DAYH6()03232018	05-18-1011-8	03/23/18	Race, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cincinnati	45248	1
Hamilton	DAYH6()04272018	05-18-1331-8	04/27/18	Disability	Discriminatory refusal to sell and negotiate for sale		Cincinnati	45215	1

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Hamilton	DAYH6()05152018	05-18-1464-8	05/15/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cincinnati	45223	1
Hamilton	DAYH6(26967)01052018	05-18-0332-8	01/05/18	Race, Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45239	1
Hamilton	DAYH6(26989)01272018	05-18-3417-8	01/27/18	Disability	Failure to make reasonable accommodation	No cause determination	Cincinnati	45214	1
Hamilton	DAYH6(27119)03022018	05-18-0834-8	03/02/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Cincinnati	45242	1
Hamilton	DAYH6(27120)03232018	05-18-1036-8	03/23/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cincinnati	45205	1
Hamilton	DAYH6(27122)03012018	05-18-0830-8	03/01/18	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cincinnati	45223	1
Hamilton	DAYH6(27153)04112018	05-18-1201-8	04/11/18	Disability	Failure to make reasonable accommodation	No cause determination	Harrison	45030	1
Hamilton	DAYH6(27193)04302018	05-18-3157-8	04/30/18	Disability	Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Harrison	45030	1
Hamilton	DAYH6(27320)05302018	05-18-1650-8	05/30/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	FHAP judicial dismissal	Cincinnati	45219	1
Hamilton	DAYH6(27323)06012018	05-18-1684-8	06/01/18	Race	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	Cincinnati	45238	1
Hamilton	DAYH6(27351)06142018	05-18-1831-8	06/14/18	Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cincinnati	45227	1
Hamilton	DAYH6(27352)06132018	05-18-1807-8	06/13/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Not Selected	Cincinnati	45237	1
Hamilton	DAYH6(27353)06142018	05-18-1829-8	06/14/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental		Cincinnati	45237	1
Hamilton	DAYH6(27388)07172018	05-18-2626-8	07/17/18	Race, Sex, Disability	Discrimination in terms and conditions of membership; Discrimination in services and facilities relating to sale; Failure to make reasonable accommodation	No cause determination	Cincinnati	45252	1
Hamilton	DAYH6(27398)07052018	05-18-2001-8	07/05/18	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Cincinnati	45214	1
Hamilton	DAYH6(27437)08082018	05-18-5274-8	08/08/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	FHAP judicial dismissal	Cincinnati	45224	1
Hamilton	DAYH6(27448)08132019	05-18-5250-8	08/13/18	Race, Disability, Familial Status	Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	No cause determination	Cincinnati	45239	1
Hamilton	DAYH6(27484)09042018	05-18-3178-8	09/04/18	Disability	Discrimination in terms and conditions of membership; Failure to permit reasonable modification; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cincinnati	45227	1
Hamilton	DAYH6(27500)9102018	05-19-3524-8	11/20/18	Race	Discriminatory financing (includes real estate transactions); Discrimination in the terms/conditions for making loans; Redlining - mortgage	No cause determination	Cincinnati	45249	1
Hamilton	DAYH6(27548)09252018	05-18-2991-8	09/25/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	FHAP judicial dismissal	Cincinnati	45224	1
Hamilton	DAYH6(27580)09242018	05-18-2977-8	09/24/18	Disability	Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Cincinnati	45211	1

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Hamilton	DAYH6(27581)10032018	05-19-3059-8	10/03/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cincinnati	45202	1
Hamilton	DAYH6(27608)10252018	05-19-3268-8	10/25/18	Familial Status	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45202	1
Hamilton	DAYH6(27694)11282018	05-19-3563-8	11/28/18	National Origin	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Cincinnati	45215	1
Hamilton	DAYH6(27698)12102018	05-19-6315-8	12/10/18	Retaliation	Otherwise deny or make housing unavailable; Other discriminatory acts	Conciliation/settlement successful	Cincinnati	45211	1
Hamilton	DAYH6(27699)12102018	05-19-6296-8	12/10/18	Disability, Retaliation	Failure to make reasonable accommodation	Conciliation/settlement successful	Cincinnati	45211	1
Hamilton	DAYH6(27712)12102018	05-19-6261-8	12/10/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	cincinnati	45227	1
Hamilton	TOLH2(39408)08132018	05-18-3069-8	08/13/18	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)		Cincinnati	45225	1
Hamilton		05-18-0861-8	01/16/18	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44113	1
Hamilton		05-18-1483-8	05/15/18	Sex	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Cincinnati	45215	1
Hancock	Total								1
Hancock	ADRH2(38972)01142018	05-18-0605-8	01/14/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Findlay	45840	1
Hardin	Total								1
Hardin	DAYH6(27289)06062018	05-18-4854-8	06/06/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Kenton	43326	1
Harrison	Total								1
Harrison	DAYH6(27079)01282018	05-18-3429-8	01/28/18	Sex, Religion, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cincinnati		1
Highland	Total								2
Highland	DAY H6 (26910) 12142017	05-18-1904-8	02/05/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Hillsboro		1
Highland	DAY H6 (27024) 02212012	05-18-3623-8	02/12/18	Disability	Failure to make reasonable accommodation	No cause determination	Greenfield	45123	1
Jackson	Total								1
Jackson	AKRH3(39828)08162018	05-18-4501-8	08/16/18	Race	Otherwise deny or make housing unavailable; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Mingo Junction	43938	1
Jefferson	Total								8
Jefferson	AKRH1(46359)08162018	05-18-3216-8	08/16/18	Race	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Refusing to provide municipal services or property	No cause determination	Mingo Junction	43938	1
Jefferson	AKRH3(39373)01252018	05-18-0593-8	01/25/18	Retaliation	Discrimination in the selling of residential real property; Steering	No cause determination	Winterville	43953	1
Jefferson	AKRH3(39821)08162018	05-18-4502-8	08/16/18	Race	Otherwise deny or make housing unavailable; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Mingo Junction	43938	1
Jefferson	AKRH3(39822)08162018	05-18-4500-8	08/21/18	Race	Otherwise deny or make housing unavailable; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Mingo Junction	43938	1
Jefferson	AKRH3(39823)08162018	05-18-4498-8	08/16/18	Race	Otherwise deny or make housing unavailable; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Mingo Junction	43938	1

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Jefferson	AKRH3(39826)08162018	05-18-4495-8	08/16/18	Race	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Mingo Junction	43938	1
Jefferson	COLH1(46275)07202018	05-18-2291-8	07/20/18	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Steubenville	43952	1
Jefferson	COLH1(46763)11082018	05-19-4828-8	11/08/18	Race, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental		Steubenville	43952	1
Lake	Total								5
Lake	ADRH4(44442)01202018	05-18-1322-8	01/20/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Willoughby	44094	1
Lake	ADRH4(44586)04142018	05-18-1627-8	04/14/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Mentor	44060	1
Lake	CLEH4(44541)03192018	05-18-1623-8	03/19/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Willoughby Hills	44092	1
Lake	CLEH4(44558)03082018	05-18-0872-8	03/08/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Painesville	44077	1
Lake	CLEH4(44701)05082018	05-18-1427-8	03/19/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Painesville	44077	1
Licking	Total								5
Licking	COLH1(46125)05222018	05-18-2336-8	05/22/18	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Newark	43055	1
Licking	COLH1(46174)04172018	05-18-1252-8	04/17/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Newark	43055	1
Licking	COLH1(46441)09142018	05-18-3141-8	09/14/18	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Granville	43023	1
Licking	COLH1(46502)10122018	05-19-3317-8	10/12/18	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Newark	43055	1
Licking	COLH1(46619)11262018	05-19-3642-8	11/26/18	Disability	Discriminatory refusal to rent; False denial or representation of availability - rental; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Newark	43055	1
Logan	Total								1
Logan	DAYH6(27400)07122018	05-18-2099-8	07/12/18	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation		Bellefontaine	43311	1
Lorain	Total								4
Lorain	CLEH4(44600)04302018	05-18-2318-8	04/30/18	Race	Discriminatory financing (includes real estate transactions); Discrimination in the making of loans; Discrimination in the terms/conditions for making loans	Complaint withdrawn by complainant after resolution	Elyria	44035	1
Lorain	CLEH4(44617)05022018	05-18-2317-8	05/02/18	Disability	Failure to make reasonable accommodation	No cause determination	Lorain	44053	1
Lorain		05-19-4380-8	11/30/18	Disability	Non-compliance with design and construction requirements (handicap)		Sheffield Village	44054	1
Lorain		05-19-4381-8	11/30/18	Disability	Non-compliance with design and construction requirements (handicap)		Sheffield Village	44054	1
Lucas	Total								50
Lucas	ADRH2(38457)09122018	05-18-3626-8	09/12/18	Race	Discriminatory financing (includes real estate transactions); Discrimination in the making of loans	Complaint withdrawn by complainant after resolution	Toledo	43620	1
Lucas	ADRH2(38963)01102018	05-18-0624-8	01/10/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43604	1
Lucas	ADRH2(39034)02202018	05-18-1570-8	02/20/18	Familial Status	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Toledo	43612	1
Lucas	ADRH2(39047)02272018	05-18-1571-8	02/27/18	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Toledo	43609	1

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Total									493
Lucas	ADRH2(39056)03062018	05-18-1220-8	03/06/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43607	1
Lucas	ADRH2(39068)03092018	05-18-1219-8	03/09/18	Disability, Familial Status	Discriminatory refusal to rent; Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discriminatory advertisement - rental; False denial or representation of availability - rental; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Steering; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43606	1
Lucas	ADRH2(39079)03152018	05-18-1221-8	03/15/18	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43613	1
Lucas	ADRH2(39168)04262018	05-18-1609-8	04/26/18	Race, Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Toledo	43623	1
Lucas	ADRH2(39348)07092018	05-18-2287-8	07/09/18	Familial Status	Discrimination in the selling of residential real property; Discrimination in terms and conditions of membership; Discrimination in terms/conditions/privileges relating to sale; Discrimination in services and facilities relating to sale	Conciliation/settlement successful	Whitehouse	43571	1
Lucas	ADRH2(39349)07092018	05-18-2276-8	07/09/18	Familial Status	Discrimination in terms and conditions of membership; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to sale	Conciliation/settlement successful	Whitehouse	43571	1
Lucas	ADRH2(39350)07092018	05-18-2277-8	07/09/18	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to sale	Conciliation/settlement successful	Whitehouse	43571	1
Lucas	ADRH2(39355)07102018	05-18-2425-8	07/10/18	Disability, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43612	1
Lucas	ADRH2(39406)08092018	05-18-2638-8	08/09/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43612	1
Lucas	ADRH2(39450)09122018	05-18-3730-8	09/12/18	Race	Discriminatory financing (includes real estate transactions); Discrimination in the appraising of residential real property; Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Toledo	43620	1
Lucas	ADRH2(39463)09202018	05-18-3752-8	09/20/18	Race, Color	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Toledo	43697	1
Lucas	ADRH2(39505)09092018	05-18-3102-8	09/09/18	Race	Discrimination in the terms/conditions for making loans; Discrimination in the appraising of residential real property; Discrimination in terms/conditions/privileges relating to sale; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant after resolution	Toledo	43620	1
Lucas	ADRH2(39506)09092018	05-18-3103-8	09/09/18	Race	Discrimination in the terms/conditions for making loans; Discrimination in the appraising of residential real property; Discrimination in terms/conditions/privileges relating to sale; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant after resolution	Toledo	43620	1
Lucas	ADRH2(39520)10192018	05-19-3920-8	10/19/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43615	1
Lucas	ADRH2(39557)11062018	05-19-3913-8	11/06/18	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43611	1
Lucas	ADRH2(39597)12102018	05-19-3911-8	12/10/18	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43697	1

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Total									493
Lucas	CLEH2(39468)09272018	05-18-4300-8	09/27/18	Disability, Retaliation	Discriminatory refusal to rent	No cause determination	Toledo	43608	1
Lucas	TOLH2(38962)01102018	05-18-0510-8	01/23/18	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Sylvania	43560	1
Lucas	TOLH2(38964)01162018	05-18-0590-8	01/16/18	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Toledo	43609	1
Lucas	TOLH2(39050)02282018	05-18-1572-8	02/28/18	Disability, Familial Status, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to sale; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43614	1
Lucas	TOLH2(39069)03092018	05-18-1218-8	03/09/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Not Selected	Toledo	43608	1
Lucas	TOLH2(39100)03272018	05-18-1391-8	03/27/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Toledo	43615	1
Lucas	TOLH2(39148)04202018	05-18-2207-8	04/20/18	Sex	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43611	1
Lucas	TOLH2(39188)05042018	05-18-1750-8	05/04/18	Religion, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Toledo		1
Lucas	TOLH2(39213)05172018	05-18-2129-8	05/17/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Maumee	43537	1
Lucas	TOLH2(39214)05172018	05-18-1844-8	05/17/18	Familial Status	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43605	1
Lucas	TOLH2(39223)05182018	05-18-1866-8	05/18/18	Race	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Steering	Conciliation/settlement successful	Toledo	43614	1
Lucas	TOLH2(39342)07042018	05-18-2770-8	07/12/18	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Toledo	43612	1
Lucas	TOLH2(39354)07102018	05-18-2436-8	07/10/18	Race	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	T	43612	1
Lucas	TOLH2(39381)07242018	05-18-2427-8	07/24/18	Race	Discriminatory refusal to rent; Discriminatory refusal to negotiate for rental; Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Toledo	43606	1
Lucas	TOLH2(39391)07312018	05-18-2438-8	07/31/18	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43614	1
Lucas	TOLH2(39418)08202018	05-18-2740-8	08/20/18	Disability	Failure to make reasonable accommodation		Sylvania	43560	1
Lucas	TOLH2(39427)08222018	05-18-2738-8	08/22/18	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Toledo	43615	1
Lucas	TOLH2(39462)09192018	05-18-3750-8	09/19/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Using ordinances to discriminate in zoning and land use; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Sylvania	43560	1
Lucas	TOLH2(39476)09212018	05-18-2949-8	09/21/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Toledo	43615	1
Lucas	TOLH2(39480)10012018	05-19-3377-8	10/01/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Toledo	43612	1

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Lucas	TOLH2(39481)10012018	05-19-3637-8	10/01/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	Toledo	43620	1
Lucas	TOLH2(39482)10022018	05-19-3173-8	10/02/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Toledo	43615	1
Lucas	TOLH2(39497)10102018	05-19-3865-8	10/10/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43614	1
Lucas	TOLH2(39532)10262018	05-19-4388-8	10/26/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Toledo	43609	1
Lucas	TOLH2(39533)10262018	05-19-3641-8	10/26/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Toledo	43620	1
Lucas	TOLH2(39534)10262018	05-19-3638-8	10/26/18	Sex	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43613	1
Lucas	TOLH2(39541)10302018	05-19-3639-8	10/30/18	Race, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Toledo	43615	1
Lucas	TOLH2(39562)1082018	05-19-3426-8	11/08/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	Toledo	43606	1
Lucas	TOLH2(39573)08212018	05-19-3436-8	11/09/18	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)		Toledo	43623	1
Lucas	TOLH2(39602)1212018	05-19-4493-8	12/13/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification	No cause determination	Toledo	43615	1
Madison	Total								1
Madison	ADRH1(46314)08022018Amend	05-18-2798-8	08/02/18	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Plain City	43064	1
Mahoning	Total								3
Mahoning	ADRH3()08172018	05-18-2583-8	08/17/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Youngstown	44509	1
Mahoning	ADRH3(39553)12142018	05-19-4274-8	12/14/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Boardman	44512	1
Mahoning	AKRH3(39547)04272018	05-18-1334-8	04/27/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Youngstown	44509	1
Medina	Total								3
Medina	ADRH4(44898)09252018	05-18-2986-8	09/25/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Wadsworth	44281	1
Medina	CLEH4(44469)01262018	05-18-1319-8	01/26/18	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Brunswick	44212	1
Medina	CLEH4(45000)11282018	05-19-3560-8	11/28/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Wadsworth	44281	1
Meigs	Total								1
Meigs	DAYH6(27551)09122018	05-18-2860-8	09/12/18	Race, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Pomeroy	45769	1
Miami	Total								2
Miami	DAYH6()10312018	05-19-3345-8	10/31/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Tipp City	45371	1

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Miami	DAYH6(27399)06292018	05-18-1955-8	06/29/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Restriction of choices relative to a rental	No cause determination	Piqua	45356	1
Montgomery	Total								32
Montgomery	3818H	05-18-3070-8	09/04/18	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Dayton	45405	1
Montgomery	3819H	05-18-3071-8	09/04/18	Disability	Failure to make reasonable accommodation	Administrative hearing ended - discrimination found	Dayton	45417	1
Montgomery	3820H	05-18-3167-8	08/22/18	Race, Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities	Administrative hearing ended - no discrimination found	Dayton	45417	1
Montgomery	3821H	05-18-4449-8	08/22/18	Race, Sex, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	Administrative hearing ended - no discrimination found	Dayton	45417	1
Montgomery	3822	05-18-3169-8	08/23/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45419	1
Montgomery	ADRH6(27731)12272018	05-19-4477-8	12/27/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Dayton	45415	1
Montgomery	ADRH6(27028)02132018	05-18-1071-8	02/13/18	Disability	Discriminatory refusal to sell; Discriminatory refusal to negotiate for sale	Conciliation/settlement successful	Huber Heights	45424	1
Montgomery	ADRH6(27113)03262018	05-18-2016-8	03/29/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Huber Heights	45424	1
Montgomery	AKRH6(27622)11052018	05-19-3929-8	11/05/18	Race, Sex, Disability, Retaliation	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Kettering	45429	1
Montgomery	CLEH6(27619)1032018	05-19-3472-8	10/31/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Miamisburg	45342	1
Montgomery	DAY H6 ((27368)07112018	05-18-4497-8	07/11/18	Race, Color, Sex	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to sale	Complaint withdrawn by complainant without resolution	Dayton	45405	1
Montgomery	DAY H6 (27115)03262018	05-18-3497-8	03/26/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	Complaint withdrawn by complainant after resolution	Dayton	45439	1
Montgomery	DAY H6 (27142)04052018	05-18-4102-8	04/05/18	Race, Color, National Origin	Discriminatory terms, conditions, privileges, or services and facilities		Kettering	45429	1
Montgomery	DAY H6 (27181)04292018	05-18-5069-8	04/30/18	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Dayton	45405	1
Montgomery	DAY H6 (27464)08232018	05-18-5594-8	08/23/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification; Failure to make reasonable accommodation		Kettering	45459	1
Montgomery	DAY H6 (27466)08232018	05-18-5570-8	08/23/18	Disability	Discriminatory refusal to rent and negotiate for rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Huber Heights	45424	1
Montgomery	DAYH6 (27178)04202018	05-18-3104-8	04/20/18	Disability, Retaliation	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Dayton	45410	1
Montgomery	DAYH6(26966)01162018	05-18-0428-8	01/16/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Dayton	45405	1
Montgomery	DAYH6(27060)03022018	05-18-3622-8	03/02/18	Familial Status	Discriminatory refusal to rent	Conciliation/settlement successful	Kettering		1
Montgomery	DAYH6(27061)03022018	05-18-5052-8	03/02/18	Disability, Familial Status	Discriminatory refusal to rent and negotiate for rental; False denial or representation of availability - rental	Conciliation/settlement successful	Kettering	45429	1
Montgomery	DAYH6(27123)03232018	05-18-1014-8	03/23/18	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Dayton	45403	1
Montgomery	DAYH6(27142)04052018	05-18-2202-8	04/05/18	Race, Color, National Origin, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Kettering	45429	1

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Richland	ADRH4(44556)03152018	05-18-0932-8	03/15/18	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Lexington	44904	1
Richland	ADRH4(44755)07192018	05-18-2769-8	07/19/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Mansfield	44903	1
Richland	CLEH4(44919)10162018	05-19-3763-8	10/16/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Mansfield	44903	1
Richland	CLEH4(44928)10092018	05-19-3079-8	10/09/18	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Mansfield	44906	1
Richland	CLEH4(44996)12042018	05-19-4272-8	12/04/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Mansfield	44907	1
Ross	Total								1
Ross	COLH1(46168)06122018	05-18-1843-8	06/12/18	Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Bainbridge	45612	1
Sandusky	Total								2
Sandusky	ADRH2(39464)09242018	05-18-3158-8	09/24/18	Familial Status, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Fremont	43420	1
Sandusky	TOLH2(39574)09282018	05-19-3427-8	11/07/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Fremont	43240	1
Stark	Total								47
Stark	17-CNT-09	05-18-0411-8	01/10/18	Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44703	1
Stark	17-CNT-10	05-18-0780-8	02/27/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Administrative hearing ended - no discrimination found	Canton	44703	1
Stark	17-CNT-11	05-18-0853-8	02/28/18	Disability	Discriminatory advertising, statements and notices	Conciliation/settlement successful	Canton	44705	1
Stark	18-CNT-01	05-18-2499-8	08/02/18	Race, Sex, Disability, Retaliation	Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Canton	44707	1
Stark	18-CNT-02	05-18-2536-8	08/02/18	Race, Religion	Steering; Other discriminatory acts; Restriction of choices relative to a rental	Conciliation/settlement successful	North Canton	44720	1
Stark	18-CNT-03	05-18-2618-8	08/20/18	Disability, Retaliation	Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44714	1
Stark	18-CNT-04	05-18-2621-8	08/15/18	Race, Disability	Discriminatory refusal to rent; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Canton	44706	1
Stark	18-CNT-05	05-18-2869-8	08/23/18	Disability, Familial Status	Failure to make reasonable accommodation	No cause determination	Canton	44706	1
Stark	18-CNT-06	05-18-2863-8	09/06/18	Race, Color, Sex, Familial Status	Other discriminatory acts	No cause determination	Canton	44706	1
Stark	18-CNT-07	05-18-2868-8	09/04/18	Sex	Discriminatory advertisement - rental; Other discriminatory acts	Conciliation/settlement successful	Canton	44707	1
Stark	18-CNT-08	05-18-2877-8	09/12/18	Race, Disability	Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44703	1
Stark	18-CNT-09	05-18-2941-8	09/19/18	Race, Sex, Disability	Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Canton	44704	1
Stark	18-CNT-10	05-18-2942-8	09/19/18	Race, Color, Sex, Familial Status	Other discriminatory acts; Failure to make reasonable accommodation	Unable to locate complainant	Canton	44705	1
Stark	18-CNT-11	05-18-3119-8	09/27/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44710	1
Stark	18-CNT-12	05-18-3116-8	09/28/18	Sex, Retaliation	Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	Administrative hearing ended - discrimination found	Canton	44707	1
Stark	18-CNT-13	05-19-3164-8	10/05/18	Race, Sex, Disability, Familial Status	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Canton	44714	1

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Stark	18-CNT-14	05-19-3168-8	10/12/18	Disability, Familial Status	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Failure to make reasonable accommodation	Complainant failed to cooperate	Canton	44710	1
Stark	18-CNT-15	05-19-3166-8	10/12/18	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Other discriminatory acts	Conciliation/settlement successful	Canton	44710	1
Stark	18-CNT-16	05-19-3170-8	10/16/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44705	1
Stark	18-CNT-17	05-19-3179-8	10/17/18	Race	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	Canton	44704	1
Stark	18-CNT-18	05-19-3419-8	10/31/18	Race, Sex, Disability, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	Conciliation/settlement successful	Canton	44705	1
Stark	18-CNT-19	05-19-3506-8	11/07/18	Sex, Disability, Familial Status	Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Canton	44702	1
Stark	18-CNT-20	05-19-3537-8	11/09/18	Race	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44709	1
Stark	18-CNT-21	05-19-3676-8	11/30/18	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44707	1
Stark	18-CNT-22	05-19-3696-8	11/30/18	Race, Disability, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Canton	44709	1
Stark	18-CNT-23	05-19-3717-8	12/05/18	Disability, Retaliation	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44714	1
Stark	18-CNT-24	05-19-3663-8	12/10/18	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification; Failure to make reasonable accommodation	No cause determination	Canton	45709	1
Stark	18-CNT-25	05-19-3753-8	12/10/18	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44714	1
Stark	18-CNT-26	05-19-3791-8	12/14/18	Sex, Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44710	1
Stark	18-CNT-27	05-19-4193-8	12/24/18	Race, Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44714	1
Stark	ADRH3(39802)09192018	05-18-3510-8	09/19/18	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	North Canton	44720	1
Stark	ADRH3(39951)12142018	05-19-3905-8	12/14/18	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Alliance	44601	1
Stark	AKRH3(39327)01022018	05-18-0592-8	01/02/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44714	1
Stark	AKRH3(39372)01252018	05-18-0604-8	01/25/18	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Massillon	44646	1
Stark	AKRH3(39401)01222018	05-18-0570-8	01/30/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Massillon	44646	1
Stark	AKRH3(39486)03292018	05-18-1373-8	03/29/18	Sex	Discriminatory refusal to rent	No cause determination	Canton		1

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Total									493
Stark	AKRH3(39543)05072018	05-18-2122-8	05/07/18	Disability	Failure to make reasonable accommodation	FHAP judicial dismissal	Louisville	44641	1
Stark	AKRH3(39626)05152018	05-18-1585-8	05/24/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant without resolution	Canton	44702	1
Stark	AKRH3(39654)07122018	05-18-2338-8	07/12/18	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Canton	44720	1
Stark	AKRH3(39726)08122018	05-18-3061-8	08/13/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	No cause determination	East Canton	44730	1
Stark	AKRH3(39796)09142018	05-18-3153-8	09/14/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Massillon	44646	1
Stark	AKRH3(39797)09142018	05-18-3159-8	09/14/18	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Unknown		1
Stark	AKRH3(39798)09142018	05-18-3160-8	09/14/18	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	unknown		1
Stark	AKRH3(39807)09212018	05-18-3176-8	09/21/18	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Canton	44705	1
Stark	AKRH3(39890)11052018	05-19-3746-8	11/05/18	Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts		North Canton	44701	1
Stark	AKRH3(39891)11022018	05-19-3728-8	11/02/18	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Massillon	44646	1
Stark	AKRH3(39967)12242018	05-19-5053-8	12/24/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	North Canton	44721	1
Summit	Total								48
Summit	ADRH3(30622)06182018	05-18-2103-8	06/18/18	Disability	Discriminatory refusal to negotiate for rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron		1
Summit	ADRH3(39445)03052018	05-18-1316-8	03/05/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44320	1
Summit	ADRH3(39460)03122018	05-18-1315-8	03/12/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44313	1
Summit	ADRH3(39491)04032018	05-18-1352-8	04/03/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44306	1
Summit	ADRH3(39536)04282018	05-18-1747-8	05/07/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Cuyahoga Falls	44223	1
Summit	ADRH3(39544)05072018	05-18-1746-8	06/07/18	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Cuyahoga Falls	44223	1
Summit	ADRH3(39560)05102018	05-18-2017-8	05/10/18	Sex, Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Cuyahoga Falls	44221	1
Summit	ADRH3(39686)07302018	05-18-2763-8	07/30/18	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44306	1
Summit	ADRH3(39732)08162018	05-18-2720-8	08/16/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices	Conciliation/settlement successful	Akron		1
Summit	AdRh3(39892)11062018	05-19-3562-8	11/06/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Akron	44320	1
Summit	ADRH3(39894)11072018	05-19-4048-8	11/07/18	Race	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Akron	44306	1
Summit	ADRH3(39936)12062018	05-19-3785-8	12/06/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Akron	44312	1
Summit	AKR39564AMENDE D	05-18-3539-8	05/14/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Akron	44312	1
Summit	AKRH3(39474)03232018	05-18-1353-8	03/23/18	Retaliation	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44302	1
Summit	AKRH3()05092018	05-18-1430-8	05/09/18	Race	Discrimination in terms/conditions/privileges relating to rental		Akron	44305	1

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Total									493
Summit	AKRH3(39319)12142017	05-18-0308-8	01/02/18	Disability, Retaliation	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Barberton	44203	1
Summit	AKRH3(39334)01042018	05-18-0465-8	01/04/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Akron	44306	1
Summit	AKRH3(39338)01062018	05-18-0512-8	01/06/18	Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Akron	44312	1
Summit	AKRH3(39345)01102018	05-18-0530-8	01/10/18	Race	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44314	1
Summit	AKRH3(39421)02172018	05-18-1371-8	02/17/18	Race, Sex, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44313	1
Summit	AKRH3(39448)02212018	05-18-0751-8	02/21/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Stow	44224	1
Summit	AKRH3(39539)05032018	05-18-1906-8	05/03/18	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Akron	44310	1
Summit	AKRH3(39561)05142018	05-18-2326-8	05/14/18	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44312	1
Summit	AKRH3(39573)05032018	05-18-2073-8	05/03/18	Sex, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities		Akron	44309	1
Summit	AKRH3(39621)06152018	05-18-2074-8	06/15/18	Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable		Akron	44304	1
Summit	AKRH3(39627)05212018	05-18-1547-8	05/21/18	Disability	Discriminatory refusal to negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Sagamore Hills - Northfield	44067	1
Summit	AKRH3(39628)06052018	05-18-1725-8	06/05/18	Race, Sex	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Stow	44224	1
Summit	AKRH3(39649)07092018	05-18-2127-8	07/09/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cuyahoga Falls	44221	1
Summit	AKRH3(39659)07172018	05-18-2302-8	07/17/18	Race, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Barberton	44203	1
Summit	AKRH3(39663)07242018	05-18-2418-8	07/24/18	Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Akron	44306	1
Summit	AKRH3(39706)08092018	05-18-2625-8	08/09/18	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Barberton	44203	1
Summit	AKRH3(39725)08102018	05-18-3538-8	08/10/18	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Akron	44304	1
Summit	AKRH3(39752)08232018	05-18-2776-8	08/23/18	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44305	1
Summit	AKRH3(39772)09042018	05-18-2797-8	09/04/18	Sex, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Lakemore	44250	1
Summit	AKRH3(39780)09062018	05-18-2817-8	09/06/18	Religion, Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Cuyahoga Falls	44221	1
Summit	AKRH3(39782)09102018	05-18-3140-8	09/10/18	Disability	Discriminatory acts under Section 818 (coercion, Etc.)		Tallmadge	44278	1
Summit	AKRH3(39788)09132018	05-18-3066-8	09/13/18	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Akron	44308	1
Summit	AKRH3(39814)09282018	05-18-3163-8	09/28/18	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Akron	44303	1

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Total									493
Summit	AKRH3(39818)10012018	05-19-3519-8	10/01/18	Race, Sex	Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44306	1
Summit	AKRH3(39819)10012018	05-19-3564-8	10/01/18	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44306	1
Summit	AKRH3(39820)10012018	05-19-3165-8	10/01/18	Race	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	No cause determination	Stow	44224	1
Summit	AKRH3(39875)10232018	05-19-3241-8	10/23/18	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Akron	44305	1
Summit	AKRH3(39926)12032018	05-19-3751-8	12/03/18	Race	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Refusing to provide municipal services or property	No cause determination	Barberton	44203	1
Summit	AKRH3(39937)12072018	05-19-4430-8	12/07/18	National Origin	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Akron	44302	1
Summit	AKRH3(39970)12182018	05-19-3947-8	12/18/18	Disability	Failure to make reasonable accommodation	No cause determination	Barberton	44203	1
Summit	WAIVED BACK HUD 6/14/18	05-18-1743-8	06/06/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to provide an accessible building entrance; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44310	1
Summit		05-18-2222-8	07/17/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Non-compliance with design and construction requirements (handicap)		Akron	44685	1
Summit		05-18-5609-8	07/17/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Non-compliance with design and construction requirements (handicap); Failure to provide accessible and usable public and common user areas		Akron	44685	1
Trumbull	Total								6
Trumbull	ADRH3(39833)10022018	05-19-3561-8	10/02/18	Sex	Discriminatory financing (includes real estate transactions)	Conciliation/settlement successful	Masury	44438	1
Trumbull	ADRH3(39876)10192018	05-19-3199-8	10/19/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Warren	44484	1
Trumbull	AKR39512	05-18-1392-8	04/12/18	Race	Discriminatory refusal to sell; Discriminatory advertising, statements and notices	No cause determination	Niles	44446	1
Trumbull	AKRH3(39402)01302018	05-18-0569-8	01/30/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities		Hubbard	44425	1
Trumbull	AKRH3(39739)08212018	05-18-2721-8	08/21/18	Race, Disability	Discriminatory financing (includes real estate transactions); Discrimination in the making of loans; Discrimination in the terms/conditions for making loans	No cause determination	Youngstown	44505	1
Trumbull	SETH7(00002)10252018	05-19-3616-8	10/25/18	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Steering		Hubbard		1
Tuscarawas	Total								2
Tuscarawas	ADRH3(39417)02142018	05-18-0837-8	02/14/18	Familial Status	Discriminatory advertising, statements and notices; Discriminatory advertisement - rental	Conciliation/settlement successful	Strasburg	44680	1
Tuscarawas	ADRH3(39653)07122018	05-18-2158-8	07/12/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	New Philadelphia	44663	1
Union	Total								5
Union	COLH1(46662)12172018	05-19-6743-8	12/17/18	Race	Discriminatory refusal to rent and negotiate for rental	No cause determination	Plane City	43064	1
Union	COLH1(46663)12172018	05-19-6739-8	12/17/18	Race	Discriminatory refusal to rent	No cause determination	Plain City	43064	1
Union	COLH1(46676)12202018	05-19-6740-8	12/20/18	Race	Discriminatory refusal to rent	No cause determination	Plain City	43064	1

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Union	COLH1(46677)12202018	05-19-6742-8	12/20/18	Race	Discriminatory refusal to rent	No cause determination	Plain City	43064	1
Union	COLH1(46678)12202018	05-19-6741-8	12/20/18	Race	Discriminatory refusal to rent	No cause determination	Plain City	43064	1
Warren	Total								5
Warren	AKRH3(39863)101602018	05-19-3148-8	10/16/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Mainville	45039	1
Warren	CLEH6(27550)09212018	05-18-2948-8	09/21/18	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Lebanon	45036	1
Warren	DAYH6(27118)	05-18-0783-8	02/26/18	Race	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Complaint withdrawn by complainant after resolution	Lebanon	45036	1
Warren	DAYH6(27434)08062018	05-19-3219-8	10/19/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Mason	45040	1
Warren	TOLH6(27691)12072018	05-19-4476-8	12/07/18	Race, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Lebanon	45036	1
Wayne	Total								3
Wayne	ADRH3(39957)12182018	05-19-4389-8	12/18/18	Retaliation	Discriminatory refusal to rent	Conciliation/settlement successful	Doylestown	44230	1
Wayne	AKRH3(39738)07302018	05-18-2322-8	07/30/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Wooster	44691	1
Wayne	AKRH3(39789)09132018	05-18-3154-8	09/13/18	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Doylestown	44230	1
Williams	Total								2
Williams	TOLH2(39172)04272018	05-18-1765-8	04/27/18	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Bryan	43506	1
Williams	TOLH2(39377)07062018	05-18-2002-8	07/06/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	West Unity	43570	1
Wood	Total								4
Wood	ADRH2(39376)07092018	05-18-2019-8	07/06/18	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Bowling Green	43402	1
Wood	TOLH2(39343)07052018	05-18-2379-8	07/05/18	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Northwood	43619	1
Wood	TOLH2(39445)09102018	05-18-3382-8	09/10/18	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Bowling Green	43402	1
Wood	TOLH2(39577)11242018	05-19-4210-8	11/24/18	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	No cause determination	Northwood	43619	1
	Total								1
	TOLH2(39477)09242018	05-18-2978-8	09/24/18	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Port Clinton	43452	1



Development
Services Agency

Appendix 14

Resolution of Federal Housing Discrimination Complaints

January 1, 2019 to December 31, 2019

APPENDIX 14
Resolution of Federal Housing Discrimination Complaints in Ohio (1/1/19 - 12/31/19)
Data provided by the Ohio Civil Rights Commission

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									439
Allen	Total								1
Allen	DAY H6 (28240) 08162019	05-19-6355-8	08/16/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Lima	45804	1
Ashtabula	Total								4
Ashtabula	CLE H4 (45548) 10272019	05-20-7639-8	10/27/19	Disability	Failure to make reasonable accommodation		Geneva	44041	1
Ashtabula	CLEH4()08292019	05-20-7216-8	11/18/19	Race, Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Ashtabula	44004	1
Ashtabula	CLEH4(45226)04252 019	05-19-5292-8	04/25/19	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Geneva	44041	1
Ashtabula	CLEH4(45227)04252 019	05-19-5293-8	04/25/19	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Geneva	44041	1
Athens	Total								4
Athens	COLH1(47134)06292 019	05-19-5775-8	06/29/19	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Athens	45701	1
Athens	COLH1(47196)05072 019	05-19-5910-8	07/22/19	Disability	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Athens	45701	1
Athens	COLH1(47320)07042019	05-19-6319-8	08/29/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	The Plains	45780	1
Athens	COLH1(47442)10252 019	05-20-6955-8	10/25/19	Sex	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts		New Marshfield	45766	1
Belmont	Total								1
Belmont	AKRH3(40121)03222 019	05-19-4680-8	03/22/19	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Uniontown	44685	1
Brown	Total								1
Brown	DAYH6()07022019	05-19-6177-8	08/14/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Georgetown	45121	1
Butler	Total								7
Butler	(CLE)H6(27775)0123 2019	05-19-4405-8	01/23/19	Retaliation	Discriminatory refusal to rent	No cause determination	Hamilton	45012	1
Butler	DAY H6 (27852) 02152019	05-19-6915-8	02/15/19	Disability	Failure to make reasonable accommodation	No cause determination	Fairfield	45011	1
Butler	DAY H6 (27897) 03082019	05-19-7564-8	03/08/19	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Fairfield	45014	1
Butler	DAY H6 (28411) 10282019	05-20-7164-8	10/28/19	Disability	Failure to make reasonable accommodation		Hamilton	45011	1
Butler	DAYH6()08162019	05-20-7418-8	12/04/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities		Hamilton	45011	1
Butler	DAYH6(28320) 08162019	05-19-6539-8	09/23/19	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities		West Chester	45069	1
Butler	DAYH6(27907)02152019	05-19-4134-8	02/15/19	Race, Sex, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Middletown	45044	1
Carroll	Total								2
Carroll	AKRH1(47328)09102 019	05-19-6616-8	09/10/19	Sex	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)		Sherrodsville	44675	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									439
Carroll	DAYH6()05152019	05-19-5670-8	06/28/19	Race	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts		Fairfield	45014	1
Clark	Total								2
Clark	ADRH6(28195)07302019	05-19-6566-8	07/30/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Springfield	45505	1
Clark	DAYH6(28043)03252019	05-19-4928-8	04/25/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Springfield	45505	1
Clermont	Total								2
Clermont	CLEH6(27763)01172019	05-19-4281-8	01/17/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Batavia	45103	1
Clermont	DAYH6()10092019	05-20-7115-8	11/08/19	National Origin	Discriminatory terms, conditions, privileges, or services and facilities		Loveland	45140	1
Clinton	Total								2
Clinton	DAYH6()03092019	05-19-4712-8	04/11/19	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities		Wilmington	45177	1
Clinton	DAYH6()05102019	05-19-5612-8	06/25/19	Disability	Discriminatory advertising, statements and notices; Failure to make reasonable accommodation		Wilmington	45177	1
Columbiana	Total								6
Columbiana	ADRH3(40076)02232019	05-19-4504-8	02/23/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Lisbon	44432	1
Columbiana	ADRH3(40164)09262018	05-19-4774-8	04/17/19	Race, Color, Sex	Discriminatory refusal to rent	Conciliation/settlement successful	East Liverpool, OH 43920	43920	1
Columbiana	AKRH3(40071)02142019	05-19-4673-8	02/14/19	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Wellsville	43968	1
Columbiana	AKRH3(40205)03242019	05-19-5191-8	05/21/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	East Liverpool	43920	1
Columbiana	AKRH3(40435)09262019	05-20-6810-8	10/16/19	Disability	Failure to make reasonable accommodation		East Liverpool	43920	1
Columbiana	AKRH3(40499)11222019	05-20-7548-8	11/22/19	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant without resolution	Lisbon	44432	1
Crawford	Total								1
Crawford	TOLH2(39742)02122019	05-19-4450-8	03/18/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Bucyrus	44820	1
Cuyahoga	Total								65
Cuyahoga	(CLE)H4(45049)01092019	05-19-5350-8	01/09/19	Race	Discriminatory refusal to rent	No cause determination	Mayfield Heights	44124	1
Cuyahoga	(CLE)H4(45077)01232019	05-19-5938-8	01/23/19	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Parma	44134	1
Cuyahoga	(CLE)H4(45137)02272019	05-19-5373-8	02/27/19	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	No cause determination	Parma	44130	1
Cuyahoga	(CLE)H4(45168)03192019	05-19-7061-8	03/19/19	Race, Sex	Other discriminatory acts	Not Selected	Lakewood	44107	1
Cuyahoga	(CLE)H4(45191)04022019	05-19-5990-8	04/02/19	Race	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	No cause determination	East Cleveland	44112	1
Cuyahoga	(CLE)H4(45269)05172019	05-19-5390-8	05/17/19	National Origin	Discriminatory advertising, statements and notices; Other discriminatory acts	Conciliation/settlement successful	Olmsted Falls	44138	1
Cuyahoga	(CLE)H4(45271)05/17/2019	05-19-5389-8	05/17/19	Sex, Familial Status	Discriminatory refusal to rent		Cleveland	44102	1
Cuyahoga	(CLE)H4(45339)06/27/2019	05-19-6103-8	06/27/19	Disability, Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental		Cleveland	44105	1

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Total									439
Cuyahoga	(CLE)H4(45376)07182019	05-19-6106-8	07/18/19	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental		Cleveland	44134	1
Cuyahoga	(CLE)H4(45379)07222019	05-19-6101-8	07/22/19	Sex, Religion, Disability	Failure to make reasonable accommodation		Cleveland	44114	1
Cuyahoga	(CLE)H4(45385)07242019	05-19-6018-8	07/24/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Amherst	44001	1
Cuyahoga	(CLE)H4(45417)08122019	05-19-6638-8	09/12/19	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation		Rocky River	44116	1
Cuyahoga	(CLE)H4(45434)08212019	05-19-6679-8	08/21/19	Disability	Failure to make reasonable accommodation		Lakewood	44107	1
Cuyahoga	(CLE)H4(45496)09262019	05-19-7840-8	09/26/19	Race	Discriminatory refusal to rent		Cleveland	44106	1
Cuyahoga	(CLE)H4(45526)10152019	05-20-7557-8	10/15/19	Disability	Discriminatory advertisement - rental		Cleveland	44113	1
Cuyahoga	ADR4(45176)03252019	05-19-5349-8	03/25/19	Disability, Retaliation	Discriminatory refusal to rent; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Cleveland	44111	1
Cuyahoga	ADRH4(45107)02122019	05-19-4572-8	02/12/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44104	1
Cuyahoga	ADRH4(45109)10222018	05-19-4025-8	02/08/19	Race	Discriminatory refusal to rent and negotiate for rental; Steering	Conciliation/settlement successful	Maple Heights	44137	1
Cuyahoga	ADRH4(45112)02142019	05-19-4279-8	02/14/19	National Origin	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Westlake	44145	1
Cuyahoga	ADRH4(45225)04252019	05-19-5294-8	04/25/19	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Parma	44134	1
Cuyahoga	ADRH4(45263)05122019	05-19-5470-8	05/12/19	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Westlake	44145	1
Cuyahoga	ADRH4(45436)06142019	05-19-6164-8	08/14/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Cleveland	44111	1
Cuyahoga	ADRH4(45473)08162019	05-19-6499-8	09/17/19	Race, Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44110	1
Cuyahoga	ADRH4(45490)09242019	05-19-7060-8	09/24/19	Sex	Discriminatory refusal to rent	Complaint withdrawn by complainant after resolution	Cleveland	44102	1
Cuyahoga	CLEH4()08262019	05-20-7217-8	11/18/19	Disability	Discrimination in terms/conditions/privileges relating to rental		Lakewood	44107	1
Cuyahoga	CLEH4(45067)01162019	05-19-4153-8	01/16/19	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Cleveland	44109	1
Cuyahoga	CLEH4(45070)01182019	05-19-4374-8	01/18/19	Race, Sex	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44111	1
Cuyahoga	CLEH4(45098)02042019	05-19-5108-8	02/04/19	Race, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Cleveland	44111	1
Cuyahoga	CLEH4(45139)03012019	05-19-4394-8	03/01/19	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Mayfield Heights	44124	1
Cuyahoga	CLEH4(45158)03052019	05-19-4250-8	03/05/19	Religion, Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	CLEVELAND	44112	1
Cuyahoga	CLEH4(45177)03252019	05-19-5109-8	03/25/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Euclid	44119	1
Cuyahoga	CLEH4(45202)04122019	05-19-5148-8	04/12/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification	Conciliation/settlement successful	Cleveland	44118	1
Cuyahoga	CLEH4(45222)02/14/20	05-19-4612-8	03/27/19	Disability	Failure to permit reasonable modification; Failure to make reasonable accommodation		Cleveland	44125	1
Cuyahoga	CLEH4(45223)02142019	05-19-4611-8	03/27/19	Disability	Failure to permit reasonable modification; Failure to make reasonable accommodation		Cleveland	44125	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									439
Cuyahoga	CLEH4(45255)05092019	05-19-5286-8	05/09/19	Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Euclid	44132	1
Cuyahoga	CLEH4(45257)02232019	05-19-5078-8	05/06/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Mayfield Heights	44124	1
Cuyahoga	CLEH4(45261)04012019	05-19-5086-8	05/10/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Parma	44134	1
Cuyahoga	CLEH4(45317)02132019	05-19-4642-8	04/04/19	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Cleveland	44104	1
Cuyahoga	CLEH4(45321)02272019	05-19-5410-8	06/11/19	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Not Selected	Middleburg Heights	44130	1
Cuyahoga	CLEH4(45330)06192019	05-19-5710-8	06/19/19	Race	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	Complaint withdrawn by complainant after resolution	North Olmsted	44070	1
Cuyahoga	CLEH4(45353)06212019	05-19-5707-8	07/02/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Refusing to provide municipal services or property; Discriminatory acts under Section 818 (coercion, Etc.)	Complaint withdrawn by complainant after resolution	Parma	44134	1
Cuyahoga	CLEH4(45362)07102019	05-19-6038-8	07/10/19	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation		Warrensville Heights	44128	1
Cuyahoga	CLEH4(45363)07102019	05-19-6196-8	07/10/19	Race, Sex, Disability, Familial Status, Retaliation	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Steering; Failure to make reasonable accommodation		Strongsville	44136	1
Cuyahoga	CLEH4(45374)06172019	05-19-5853-8	07/17/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		North Olmsted	44070	1
Cuyahoga	CLEH4(45382)07232019	05-19-6037-8	07/23/19	Disability	Failure to permit reasonable modification		Warrensville Heights	44128	1
Cuyahoga	CLEH4(45403)08012019	05-19-6260-8	08/01/19	Disability	Discriminatory refusal to rent; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental		Cleveland	44103	1
Cuyahoga	CLEH4(45410)08132019	05-19-6678-8	08/13/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Cleveland	44120	1
Cuyahoga	CLEH4(45418)08132019	05-19-6677-8	08/13/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Cleveland	44120	1
Cuyahoga	CLEH4(45423)08152019	05-19-6681-8	08/15/19	Disability	Discriminatory refusal to rent		Euclid	44132	1
Cuyahoga	CLEH4(45440)08282019	05-19-7358-8	08/28/19	Retaliation	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga	CLEH4(45469)06242019	05-19-6457-8	09/13/19	Race	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable		Cleveland heights	44106	1
Cuyahoga	CLEH4(45477)09192019	05-19-6577-8	09/19/19	Disability	Discriminatory refusal to rent	No cause determination	Brooklyn	44144	1
Cuyahoga	CLEH4(45489)06062019	05-19-6520-8	09/19/19	Familial Status	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Cleveland	44120	1
Cuyahoga	CLEH4(45527)10152019	05-20-7415-8	10/15/19	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory advertisement - rental; Discrimination in terms/conditions/privileges relating to rental		Cleveland	44102	1
Cuyahoga	CLEH4(45531)10162019	05-20-7497-8	10/16/19	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Westlake	44145	1
Cuyahoga	CLEH4(45539)08062019	05-20-6715-8	10/04/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Parma Heights	44130	1
Cuyahoga	FH-19-01	05-19-6787-8	09/06/19	Sex	Discriminatory acts under Section 818 (coercion, Etc.)		Shaker Heights	44120	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									439
Cuyahoga		05-19-4864-8	04/25/19	Race, National Origin, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable		Olmsted Falls	44138	1
Cuyahoga		05-19-5790-8	07/11/19	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga		05-19-5791-8	07/11/19	Disability	Non-compliance with design and construction requirements (handicap)	Complaint withdrawn by complainant without resolution	Cleveland	44102	1
Cuyahoga		05-19-5792-8	07/11/19	Disability	Non-compliance with design and construction requirements (handicap)	Conciliation/settlement successful	Cleveland	44102	1
Cuyahoga		05-19-6320-8	08/30/19	Race	Discrimination in terms/conditions/privileges relating to rental		shaker hts	44120	1
Cuyahoga		05-19-6575-8	09/25/19	Race, Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices		Shaker Heights	44120	1
Cuyahoga		05-20-7136-8	11/12/19	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Parma	44130	1
Cuyahoga		05-20-7500-8	12/12/19	Disability	Failure to make reasonable accommodation		Cleveland	44144	1
Darke	Total								2
Darke	CLEH4(45183)03282019	05-19-5110-8	03/28/19	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Maple Heights	44137	1
Darke	DAY H6 (27989) 04092019	05-19-7357-8	04/09/19	Disability	Failure to permit reasonable modification		Greenwood	45331	1
Defiance	Total								1
Defiance	ADRH4(45309)06072019	05-19-6256-8	06/07/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Parma	44134	1
Delaware	Total								2
Delaware	COLH1(47081)04142019	05-19-5352-8	06/03/19	Disability	Failure to provide an accessible route into and thru the covered unit; Failure to make reasonable accommodation	No cause determination	Powell	43065	1
Delaware	COLH1(47435)09062019	05-20-6856-8	10/21/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Powell	43065	1
Erie	Total								1
Erie	CLEH4(45501)09302019	05-19-6657-8	09/30/19	Disability	Discriminatory refusal to rent; Other discriminatory acts; Failure to make reasonable accommodation	Conciliation/settlement successful	Huron	44839	1
Fairfield	Total								7
Fairfield	COLH1(46587)03012019	05-19-5451-8	03/01/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Reynoldsburg	43068	1
Fairfield	COLH1(46949)04152019	05-19-4749-8	04/15/19	Disability	Discriminatory refusal to rent; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Pleasantville	43148	1
Fairfield	COLH1(46950)04162019	05-19-4768-8	04/16/19	Sex, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Reynoldsburg	43068	1
Fairfield	COLH1(47161)07122019	05-19-5812-8	07/12/19	Disability	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation		Lancaster	43130	1
Fairfield	COLH1(47199)07242019	05-19-6356-8	07/24/19	Race	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental		Lancaster	43130	1
Fairfield	COLH1(47322)09122019	05-19-6497-8	09/12/19	Retaliation	Discriminatory refusal to rent		Columbus	43212	1
Fairfield		05-20-6976-8	10/30/19	Race, Religion	Discriminatory acts under Section 901 (criminal)		Reynoldsburg	43068	1
Franklin	Total								49
Franklin	ADRH1(46795)02082019	05-19-4027-8	02/08/19	Sex, Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43223	1
Franklin	ADRH1(46923)04012019	05-19-4629-8	04/01/19	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Columbus	43229	1
Franklin	ADRH1(47144)05212019	05-19-5629-8	06/26/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Gahanna	43230	1

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Franklin	ADRH1(47460)10312019	05-20-7037-8	10/31/19	Disability	Failure to permit reasonable modification	Conciliation/settlement successful	Delaware	43215	1
Franklin	COLH1()10232019	05-20-7147-8	11/13/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Dublin	43016	1
Franklin	COLH1(46974)03202019	05-19-4632-8	04/02/19	Race, Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43204	1
Franklin	COLH1(47058)04252019	05-19-5234-8	05/23/19	Race	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable	Dismissed for lack of jurisdiction	Columbus	43123	1
Franklin	COLH1(47117)04242019	05-19-5500-8	06/17/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities		Westerville	43086	1
Franklin	COLH1(47194)05052019	05-19-5854-8	07/17/19	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Dublin	43017	1
Franklin	COLH1(46694)01032019	05-19-7156-8	01/03/19	Race	Other discriminatory acts	No cause determination	Columbus	43222	1
Franklin	COLH1(46716)01092019	05-19-7166-8	01/09/19	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Worthington	43085	1
Franklin	COLH1(46749)01252019	05-19-3923-8	01/28/19	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43219	1
Franklin	COLH1(46750)01252019	05-19-3924-8	01/28/19	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in services and facilities relating to rental	No cause determination	Columbus	43219	1
Franklin	COLH1(46793)02082019	05-19-4026-8	02/08/19	Familial Status	Discriminatory advertising, statements and notices	Dismissed for lack of jurisdiction	Columbus	43212	1
Franklin	COLH1(46807)02152019	05-19-4689-8	02/15/19	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Columbus	43232	1
Franklin	COLH1(46822)02192019	05-19-4348-8	02/19/19	Disability	Failure to make reasonable accommodation	No cause determination	Columbus	43201	1
Franklin	COLH1(46893)01022019	05-19-4403-8	03/15/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Columbus	43228	1
Franklin	COLH1(46897)03212019	05-19-4770-8	03/21/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation		Columbus	43232	1
Franklin	COLH1(46907)03122019	05-19-4507-8	03/21/19	National Origin, Religion, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)		Columbus	43214	1
Franklin	COLH1(46920)02252019	05-19-4594-8	04/01/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Columbus	43212	1
Franklin	COLH1(46961)04172019	05-19-5450-8	04/17/19	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43207	1
Franklin	COLH1(46977)03112019	05-19-4852-8	04/23/19	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Columbus	43215	1
Franklin	COLH1(47015)06182019	05-19-6013-8	06/18/19	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Whitehall	43213	1
Franklin	COLH1(47026)05162019	05-19-5154-8	05/16/19	Disability, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Columbus	43232	1
Franklin	COLH1(47076)06102019	05-19-5431-8	06/10/19	Disability, Retaliation	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation	No cause determination	Columbus	43205	1
Franklin	COLH1(47080)06112019	05-19-6158-8	06/11/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Columbus	43213	1

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Franklin	COLH1(47118)05212019	05-19-5455-8	06/13/19	Race	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Columbus	43230	1
Franklin	COLH1(47157)07112019	05-19-5890-8	07/11/19	Disability	False denial or representation of availability - rental; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Westerville	43081	1
Franklin	COLH1(47167)07152019	05-19-5836-8	07/15/19	Retaliation	Discriminatory refusal to rent		Columbus	43232	1
Franklin	COLH1(47182)07192019	05-19-5911-8	07/19/19	Disability	Failure to make reasonable accommodation		Bexley	43209	1
Franklin	COLH1(47189)07222019	05-19-6157-8	07/22/19	Race, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Columbus	43227	1
Franklin	COLH1(47193)07232019	05-19-5940-8	07/23/19	Disability, Retaliation	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation	No cause determination	Columbus	43207	1
Franklin	COLH1(47195)07222019	05-19-5941-8	07/22/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43220	1
Franklin	COLH1(47227)08062019	05-19-6075-8	08/06/19	Race	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Columbus	43219	1
Franklin	COLH1(47228)08062019	05-19-6095-8	08/07/19	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities		Columbus	43219	1
Franklin	COLH1(47308)09062019	05-19-6439-8	09/06/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Reynoldsburg	43068	1
Franklin	COLH1(47319)07172019	05-19-6276-8	08/26/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Dismissed for lack of jurisdiction	Columbus	43235	1
Franklin	COLH1(47376)08172019	05-19-6556-8	09/23/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation		Columbus	43211	1
Franklin	COLH1(47412)10112019	05-20-6808-8	10/15/19	Sex	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Columbus	43232	1
Franklin	COLH1(47418)10152019	05-20-6935-8	10/15/19	Sex, Retaliation	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Columbus	43227	1
Franklin	COLH1(47423)10172019	05-20-6835-8	10/17/19	Race	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental		Columbus	43209	1
Franklin	COLH1(47471)11012019	05-20-7059-8	11/01/19	Race	Discriminatory terms, conditions, privileges, or services and facilities		Columbus	43231	1
Franklin	COLH1(47491)11132019	05-20-7211-8	11/13/19	Race	Discriminatory terms, conditions, privileges, or services and facilities		Columbus	43223	1
Franklin	COLH1(47495)11152019	05-20-7213-8	11/15/19	Race, Sex	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities		Columbus	43207	1
Franklin	COLH1(47533)12062019	05-20-7495-8	12/06/19	National Origin, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Columbus	43232	1
Franklin	COLH1(47555)12172019	05-20-7655-8	12/17/19	Disability	Failure to make reasonable accommodation		Columbus	43214	1
Franklin		05-20-6981-8	10/31/19	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Reynoldsburg	43068	1
Franklin		05-20-7295-8	11/22/19	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Dublin	43016	1

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Franklin		05-20-7378-8	12/02/19	National Origin	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Reynoldsburg	43068	1
Fulton	Total								3
Fulton	TOLH2(39827)04252019	05-19-4948-8	04/25/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Metamora	43540	1
Fulton		05-19-6136-8	08/13/19	Race	Discriminatory terms, conditions, privileges, or services and facilities		Swanton		1
Fulton		05-19-6183-8	08/15/19	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Swanton	43558	1
Geauga	Total								4
Geauga	CLEH4(45116)02192019	05-19-4396-8	02/19/19	Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Hiram	44234	1
Geauga	CLEH4(45350)07082019	05-19-5882-8	07/08/19	Race	Discrimination in terms/conditions/privileges relating to rental		Hiram	44234	1
Geauga	CLEH4(45416)08082019	05-19-6510-8	09/18/19	National Origin, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Conciliation/settlement successful	Chagrin Falls	44022	1
Geauga	CLEH4(45558)11042019	05-20-7356-8	11/04/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental		Chardon	44024	1
Greene	Total								1
Greene	DAY H6 (27877) 03042019	05-19-7566-8	03/04/19	Race	Discriminatory advertising, statements and notices; Discriminatory advertisement - rental; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Fairborn	45324	1
Hamilton	Total								33
Hamilton	ADRH6()09252019	05-20-6617-8	10/01/19	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Cleves	45002	1
Hamilton	ADRH6(27917)03142019	05-19-4400-8	03/14/19	Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Cincinnati	45246	1
Hamilton	ADRH6(28008)02142019	05-19-4682-8	04/09/19	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Conciliation/settlement successful	Cincinnati	45246	1
Hamilton	DAY H6 (28029) 05062019	05-19-7456-8	05/06/19	Disability	Failure to make reasonable accommodation		Cincinnati	45251	1
Hamilton	DAY H6 (28111) 06132019	05-19-6456-8	06/13/19	Sex, Disability	Discriminatory terms, conditions, privileges, or services and facilities		Cincinnati	45203	1
Hamilton	DAYH6()06262019	05-19-6036-8	08/05/19	Disability	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Forest Park	45240	1
Hamilton	DAYH6()07132019	05-19-6513-8	09/18/19	Familial Status	Discriminatory advertising, statements and notices		Cincinnati	45212	1
Hamilton	DAYH6()09092019	05-20-7435-8	12/06/19	Race, Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable		Cincinnati	45236	1
Hamilton	DAYH6()10102019	05-20-7550-8	12/17/19	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation		Cincinnati	45240	1
Hamilton	DAYH6()10112019	05-20-7255-8	11/18/19	Race	Discrimination in the making of loans; Discrimination in the terms/conditions for making loans		Cincinnati	45251	1
Hamilton	DAYH6(28007)08232018	05-19-4613-8	04/02/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities		Cincinnati	45241	1
Hamilton	DAYH6(27908)03082019	05-19-4309-8	03/08/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Cincinnati	45238	1

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Hamilton	DAYH6(27909)03072019	05-19-4278-8	03/07/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Cincinnati	45246	1
Hamilton	DAYH6(27943)01042019	05-19-4478-8	03/20/19	Race, Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Cincinnati	45225	1
Hamilton	DAYH6(27968)02082019	05-19-4536-8	03/26/19	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Steering		Cincinnati	45237	1
Hamilton	DAYH6(27970)02082019	05-19-4570-8	03/27/19	Disability	Non-compliance with design and construction requirements (handicap)	Complaint withdrawn by complainant after resolution	Cincinnati	45219	1
Hamilton	DAYH6(27970)02082019 Amen	05-19-4541-8	03/26/19	Disability	Non-compliance with design and construction requirements (handicap)	Complaint withdrawn by complainant after resolution	Cincinnati	45227	1
Hamilton	DAYH6(28009)03142019	05-19-4679-8	04/09/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Cincinnati	45231	1
Hamilton	DAYH6(28010)03042019	05-19-4684-8	04/09/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Cincinnati	45209	1
Hamilton	DAYH6(28011)03262019	05-19-4639-8	04/04/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification		Cincinnati	45231	1
Hamilton	DAYH6(28012)03252019	05-19-4640-8	04/04/19	Familial Status	Discriminatory terms, conditions, privileges, or services and facilities		Cincinnati	45211	1
Hamilton	DAYH6(28071)04242019	05-19-5392-8	06/10/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Loveland	45140	1
Hamilton	DAYH6(28072)05282019	05-19-6790-8	05/28/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation		Loveland	45102	1
Hamilton	DAYH6(28096)04302019	05-19-5409-8	06/10/19	Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discrimination in services and facilities relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Cincinnati	45211	1
Hamilton	DAYH6(28433)11122019	05-20-7316-8	11/12/19	Disability	Discriminatory refusal to rent		Cincinnati	45229	1
Hamilton	DAYH6(28460)08212019	05-20-7138-8	11/12/19	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation		Cincinnati	45244	1
Hamilton		05-19-5793-8	07/10/19	National Origin, Religion	Discriminatory advertising, statements and notices; Discrimination in the making of loans	Conciliation/settlement successful	Cincinnati	45208	1
Hamilton		05-19-6502-8	09/17/19	Race	Discriminatory terms, conditions, privileges, or services and facilities		Cincinnati	45246	1
Hamilton		05-20-6996-8	11/01/19	Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Cincinnati	45237	1
Hamilton		05-20-7499-8	12/11/19	Familial Status	Discriminatory refusal to negotiate for rental; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable		Cincinnati	45208	1
Hamilton		05-20-7615-8	12/26/19	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Cincinnati	45205	1
Hamilton		05-20-7617-8	12/27/19	Disability	Failure to make reasonable accommodation		Cincinnati	45211	1
Hamilton		05-20-7618-8	12/27/19	Race	Discriminatory acts under Section 818 (coercion, Etc.)		Cincinnati	45205	1
Hancock	Total								2
Hancock	TOLH2(39726)11052018	05-19-4131-8	02/19/19	Race, Color	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Findlay	45840	1

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Hancock	TOLH2(39943)06262019	05-19-5711-8	06/26/19	Disability	Failure to provide an accessible building entrance; Failure to provide usable doors; Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Fostoria	44830	1
Hardin	Total								2
Hardin	DAYH6(28251)08192019	05-19-6560-8	08/19/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Kenton	43326	1
Hardin	DAYH6(28251)08192019	05-19-6561-8	08/19/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Kenton	43326	1
Holmes	Total								2
Holmes	ADRH3(40242)06282019	05-19-5888-8	06/28/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Steering; Failure to make reasonable accommodation	Conciliation/settlement successful	Millersburg	44654	1
Holmes	ADRH3(40253)06282019	05-19-5889-8	06/28/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Steering; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Millersburg	44654	1
Jackson	Total								1
Jackson	DAYH6()09032019	05-19-6576-8	09/25/19	Disability	Failure to permit reasonable modification		Oak Hill	45656	1
Jefferson	Total								4
Jefferson	AKRH3(40336)08152019	05-19-6444-8	08/15/19	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Wintersville	43953	1
Jefferson	COLH1(46886)03182019	05-19-4678-8	03/18/19	Race, Familial Status	Discriminatory refusal to rent		Steubenville	43953	1
Jefferson	COLH1(47166)07152019	05-19-6215-8	08/15/19	Race	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts		Steubenville	43953	1
Jefferson	COLH1(47168)07152019	05-19-6780-8	07/15/19	Race	Other discriminatory acts	No cause determination	Steubenville	43953	1
Lake	Total								6
Lake	(CLE)H4(45460)09092019	05-19-6764-8	09/09/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Willoughby Hills	44092	1
Lake	CLEH4()06072019	05-19-6165-8	08/14/19	Familial Status	Discriminatory refusal to rent		Willoughby	44094	1
Lake	CLEH4(45276)02192019	05-19-5152-8	05/16/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Wickliffe	44092	1
Lake	CLEH4(45359)02192019	05-19-5852-8	02/19/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Eastlake	44095	1
Lake	CLEH4(45530)10152019	05-20-7063-8	10/15/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Eastlake	44095	1
Lake		05-20-7502-8	12/13/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities		Madison	44057	1
Licking	Total								2
Licking	COLH1(47011)05102019	05-19-6979-8	05/10/19	Disability	Discriminatory refusal to rent		Johnstown	43031	1
Licking	COLH1(47016)04082019	05-19-5081-8	05/10/19	Disability	Discriminatory refusal to negotiate for rental; Failure to make reasonable accommodation	No cause determination	Newark	43055	1
Logan	Total								1
Logan	DAYH6(28103)06112019	05-19-6564-8	06/11/19	Disability, Retaliation	Failure to make reasonable accommodation		Zanesfield	43360	1
Lorain	Total								6
Lorain	(CLE)H4(45464)09122019	05-19-7056-8	09/12/19	Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Elyria	44035	1
Lorain	CLEH4(45108)02122019	05-19-4399-8	02/12/19	Sex	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Lorain	44052	1

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Lorain	CLEH4(45256)04252019	05-19-5028-8	05/06/19	Color	Discrimination in terms/conditions/privileges relating to sale	No cause determination	Avon	44011	1
Lorain	CLEH4(45364)07102019	05-19-5935-8	07/22/19	Race, Disability, Retaliation	Failure to make reasonable accommodation	No cause determination	Lorain	44053	1
Lorain	CLEH4(45400)07312019	05-19-6259-8	07/31/19	Sex	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Lorain	44052	1
Lorain	CLEH4(45415)08082019	05-19-6668-8	08/08/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		North Ridgeville	44039	1
Lucas	Total								45
Lucas	ADRH2(39992)07232019	05-19-6025-8	07/23/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43620	1
Lucas	ADRH2(39996)07232019	05-19-6026-8	07/23/19	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Toledo	43607	1
Lucas	ADRH2(40021)07292019	05-19-6035-8	07/29/19	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities	Complaint withdrawn by complainant after resolution	Toledo	43605	1
Lucas	ADRH2(40026)07302019	05-19-6029-8	07/30/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43605	1
Lucas	ADRH2(40068)08202019	05-19-6258-8	08/20/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Toledo	43615	1
Lucas	ADRH2(40198)10282019	05-20-7163-8	10/28/19	Race, Disability	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Toledo	43609	1
Lucas	TOLH2()0415201	05-19-5873-8	07/18/19	National Origin, Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43625	1
Lucas	TOLH2()04152019	05-19-5874-8	07/18/19	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Dismissed for lack of jurisdiction	Toledo	43615	1
Lucas	TOLH2()07172019	05-19-5876-8	07/18/19	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43625	1
Lucas	TOLH2()07172019	05-19-5877-8	07/18/19	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43625	1
Lucas	TOLH2()07172019	05-19-5878-8	07/18/19	National Origin, Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43613	1
Lucas	TOLH2()07172019	05-19-5879-8	07/18/19	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43613	1
Lucas	TOLH2()07172019	05-19-5880-8	07/18/19	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43623	1
Lucas	TOLH2()07172019	05-19-5881-8	07/18/19	National Origin, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43623	1
Lucas	TOLH2()04152019	05-19-5875-8	07/18/19	National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	Dismissed for lack of jurisdiction	Toledo	43625	1
Lucas	TOLH2(39667)02012019	05-19-4968-8	02/01/19	Sex	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable	No cause determination	Toledo	43606	1
Lucas	TOLH2(39713)03062019	05-19-4431-8	03/06/19	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43614	1
Lucas	TOLH2(39734)0352019	05-19-4858-8	03/15/19	Race, Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43611	1
Lucas	TOLH2(39741)03182019	05-19-5310-8	03/18/19	Race, Sex	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43615	1

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Lucas	TOLH2(39785)04082019	05-19-6899-8	04/08/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Toledo	43614	1
Lucas	TOLH2(39807)04152019	05-19-5432-8	04/15/19	Sex, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Toledo	43609	1
Lucas	TOLH2(39813)04162019	05-19-4857-8	04/16/19	Race	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Toledo	43615	1
Lucas	TOLH2(39859)03282019	05-19-5074-8	05/09/19	National Origin, Disability	Discriminatory refusal to sell; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Toledo	43612	1
Lucas	TOLH2(39860)03282019	05-19-5073-8	05/09/19	National Origin, Disability	Discriminatory refusal to sell; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Toledo	43612	1
Lucas	TOLH2(39868)05142019	05-19-5930-8	05/14/19	Disability	Failure to make reasonable accommodation		Sylvania	43560	1
Lucas	TOLH2(39889)05212019	05-19-5706-8	05/21/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Toledo	43607	1
Lucas	TOLH2(39929)05242019	05-19-5712-8	05/24/19	Race	Discriminatory refusal to sell; Discriminatory financing (includes real estate transactions); Discriminatory terms, conditions, privileges, or services and facilities		Toledo	43608	1
Lucas	TOLH2(39937)06172019	05-19-6057-8	06/17/19	Disability	Failure to make reasonable accommodation		Toledo	43607	1
Lucas	TOLH2(40040)08062019	05-19-6178-8	08/06/19	Familial Status	Discriminatory refusal to rent and negotiate for rental		Sylvania	43560	1
Lucas	TOLH2(40069)08202019	05-19-6312-8	08/20/19	Disability	Failure to make reasonable accommodation		Toledo	43604	1
Lucas	TOLH2(40094)09042019	05-19-6529-8	09/04/19	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Toledo	43614	1
Lucas	TOLH2(40120)08062019	05-19-6511-8	09/18/19	Disability	Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Toledo	43620	1
Lucas	TOLH2(40127)09232019	05-19-7064-8	09/23/19	Race	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities		Toledo	43620-1670	1
Lucas	TOLH2(40152)10042019	05-20-7395-8	10/04/19	Disability	Failure to make reasonable accommodation		Toledo	43613	1
Lucas	TOLH2(40182)10172019	05-20-7419-8	10/17/19	Race, Sex	Discrimination in terms/conditions/privileges relating to rental		Toledo	43615	1
Lucas	TOLH2(40206)10312019	05-20-7355-8	10/31/19	Disability	Failure to make reasonable accommodation		Toledo	43605	1
Lucas	TOLH2(40209)11042019	05-20-7476-8	11/04/19	Race	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Toledo	43605	1
Lucas	TOLH2(40224)11082019	05-20-7398-8	11/08/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Toledo	43615	1
Lucas	TOLH2(40241)11132019	05-20-7696-8	11/13/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Toledo	43615	1
Lucas	TOLH2(40249)11152019	05-20-7556-8	11/15/19	Race, Sex, Religion	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale		Toledo	43607	1
Lucas	TOLH2(40278)12022019	05-20-7678-8	12/02/19	Race	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Toledo	43612	1
Lucas	TOLH2(40287)12052019	05-20-7501-8	12/05/19	National Origin, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Toledo	43604	1
Lucas	TOLH2(40309)12132019	05-20-7640-8	12/13/19	Disability	Failure to make reasonable accommodation		Bucyrus	44820	1
Lucas		05-19-5489-8	06/17/19	Race, National Origin	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale; Discrimination in services and facilities relating to sale	No cause determination	Toledo	43623	1

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Lucas		05-19-5490-8	06/17/19	Race, National Origin	Discriminatory refusal to sell and negotiate for sale; Discrimination in terms/conditions/privileges relating to sale; Otherwise deny or make housing unavailable	No cause determination	Toledo	43623	1
Mahoning	Total								9
Mahoning	ADRH3(40077)02252019	05-19-4669-8	02/25/19	Religion	Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Youngstown	44511	1
Mahoning	AKRH1(47057)05292019	05-19-5353-8	05/29/19	Race	Discriminatory refusal to negotiate for sale; Discrimination in the selling of residential real property	No cause determination	Youngstown	44511	1
Mahoning	AKRH3(40105)03112019	05-19-4470-8	03/11/19	Familial Status, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Canfield	44406	1
Mahoning	AKRH3(40131)01272019	05-19-4489-8	03/21/19	Familial Status	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Boardman Township	44512	1
Mahoning	AKRH3(40132)07052018	05-19-4208-8	02/28/19	Disability	Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Youngstown	44114	1
Mahoning	AKRH3(40259)05222019	05-19-5749-8	07/05/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Dismissed for lack of jurisdiction	Canfield	44406	1
Mahoning	AKRH3(40354)06052019	05-19-5733-8	07/05/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Youngstown	44515	1
Mahoning	AKRH3(40491)11182019	05-20-7335-8	11/18/19	Familial Status, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Canfield	44406	1
Mahoning	WAIVED BACK TO HUD 92019	05-19-6512-8	09/18/19	National Origin	Discriminatory terms, conditions, privileges, or services and facilities		Youngstown	44510	1
Marion	Total								2
Marion	ADRH1(46874)03052019	05-19-4252-8	03/05/19	Familial Status	Discriminatory refusal to rent and negotiate for rental	Conciliation/settlement successful	Marion	43302	1
Marion	COLH1(47521)11252019	05-20-7432-8	11/25/19	Sex, Disability	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts		Marion	43302	1
Medina	Total								2
Medina	ADRH3(40257)07022019	05-19-5714-8	07/02/19	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Medina	44311	1
Medina	AKRH3(40151)04122019	05-19-5008-8	04/12/19	Race, Sex, Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Brunswick	44212	1
Meigs	Total								1
Meigs	DAYH6(27967)031952019	05-19-4531-8	03/25/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	No cause determination	Racine	45771	1
Mercer	Total								1
Mercer	DAYH6()05062019	05-19-5730-8	07/05/19	Sex, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Refusing to provide municipal services or property; Discriminatory acts under Section 818 (coercion, Etc.)		Celina	45822	1
Montgomery	Total								43
Montgomery	3738H	05-19-6097-8	05/17/19	Disability	Discrimination in terms/conditions/privileges relating to rental		Dayton	45403	1
Montgomery	3739H	05-19-6156-8	05/17/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities		Dayton	45403	1
Montgomery	3825H	05-19-4030-8	01/15/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Dayton	45410	1

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Montgomery	3826H	05-19-4006-8	01/15/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities	Unable to locate complainant	DAYTON	45406	1
Montgomery	3827H	05-19-4294-8	01/22/19	Race	Discriminatory refusal to sell; Discriminatory refusal to sell and negotiate for sale	No cause determination	Dayton	45414	1
Montgomery	3828H	05-19-5692-8	01/29/19	Disability	Failure to make reasonable accommodation		Dayton	45417	1
Montgomery	3829H	05-19-5691-8	01/29/19	Race, Sex, Disability	Failure to make reasonable accommodation		Dayton	45417	1
Montgomery	3830H	05-19-4568-8	02/19/19	Race, Sex, Disability, Retaliation	Other discriminatory acts	No cause determination	Dayton	45402	1
Montgomery	3831H	05-19-4909-8	03/29/19	Disability	Failure to make reasonable accommodation		Dayton	45432	1
Montgomery	3832H	05-19-4936-8	04/11/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45414	1
Montgomery	3833H	05-19-5502-8	04/25/19	Race, Color, Sex, Familial Status	Use of discriminatory indicators	Conciliation/settlement successful	Dayton	45406	1
Montgomery	3834H	05-19-6021-8	05/06/19	Disability	Discriminatory refusal to rent		Dayton	45420	1
Montgomery	3835H	05-19-5952-8	03/27/19	Disability	Discriminatory refusal to rent		Dayton	43065	1
Montgomery	3836 H	05-19-5593-8	05/16/19	Race, Color, Sex, Disability	Discriminatory refusal to rent		Centerville	45458	1
Montgomery	3840H	05-19-5832-8	07/03/19	Disability	Discriminatory refusal to rent		Dayton	45402	1
Montgomery	3843H	05-19-5886-8	06/24/19	Race, Disability	Discriminatory refusal to rent		Dayton	45402	1
Montgomery	3844H	05-19-5884-8	06/28/19	Race, Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental		Dayton	45402	1
Montgomery	3845H	05-19-6316-8	07/26/19	Race, Color, Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Dayton	45405	1
Montgomery	3847H	05-19-6017-8	07/31/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Dayton	45439	1
Montgomery	3848H	05-19-6377-8	08/20/19	Sex, Disability, Retaliation	Failure to permit reasonable modification		Dayton	45420	1
Montgomery	3849H	05-19-6437-8	08/23/19	Sex, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities		Dayton	45420	1
Montgomery	ADRH(28013)04242019	05-19-5273-8	04/24/19	Disability	Discriminatory refusal to rent; Failure to permit reasonable modification	Conciliation/settlement successful	Kettering	45419	1
Montgomery	ADRH6(28016)04252019	05-19-6016-8	04/25/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	Conciliation/settlement successful	Huber Heights	45405	1
Montgomery	ADRH6(28189)07252019	05-19-6517-8	07/25/19	Race, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	West Carrollton	45449	1
Montgomery	ADRH6(28205)08022019	05-19-6817-8	08/02/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45439	1
Montgomery	ADRH6(28206)08022019	05-19-6785-8	08/02/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45439-3263	1
Montgomery	ADRH6(28305)09162019	05-19-6818-8	09/16/19	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Other discriminatory acts	Conciliation/settlement successful	Kettering	45419	1
Montgomery	ADRH6(28317)09242019	05-19-6820-8	09/24/19	Disability, Familial Status, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification	Conciliation/settlement successful	Dayton	45458	1
Montgomery	DAY H6 (27811) 02042019	05-19-6583-8	02/04/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Conciliation/settlement successful	Dayton	45416	1
Montgomery	DAY H6 (27812) 0204019	05-19-7157-8	02/04/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to permit reasonable modification	Conciliation/settlement successful	Dayton	45416	1
Montgomery	DAY H6 (27812) 02042019	05-19-6857-8	02/04/19	Disability	Failure to make reasonable accommodation		Dayton	45416	1
Montgomery	DAY H6 (27833) 02112019	05-19-5290-8	02/11/19	Race, Color	Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Dayton	45424	1
Montgomery	DAY H6 (27834) 02112019	05-19-7277-8	02/11/19	Race, National Origin	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts	No cause determination	Dayton	45424	1

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Richland	ADRH4(45219)04182019	05-19-5295-8	04/19/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Mansfield	44906	1
Richland	CLEH1(47047)05232019	05-19-5429-8	05/23/19	Disability	Failure to make reasonable accommodation	No cause determination	Mansfield	44902	1
Richland	CLEH4(45153)03022019	05-19-5708-8	03/02/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Mansfield	44907	1
Richland	CLEH4(45159)02282019	05-19-4211-8	02/28/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	Dismissed for lack of jurisdiction	Lexington	44904	1
Richland	CLEH4(45500)07242019	05-19-6587-8	09/27/19	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable		Mansfield	44905	1
Richland		05-20-7281-8	11/22/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Ontario	44906	1
Ross	Total								3
Ross	COLH1(47103)06142019	05-19-5530-8	06/14/19	Familial Status, Retaliation	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Chillicothe	45601	1
Ross	COLH1(47104)06142019	05-19-5569-8	06/14/19	Familial Status	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental		Chillicothe	45601	1
Ross	COLH1(47318)07152019	05-19-6364-8	09/05/19	Race, Disability, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Chillicothe	45601	1
Sandusky	Total								1
Sandusky	TOLH2(39980)07182019	05-19-5950-8	07/18/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Clyde	43410	1
Stark	Total								27
Stark	18-CNT-28	05-19-4194-8	01/04/19	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Canton	44709	1
Stark	18-CNT-29	05-19-3989-8	01/11/19	Race, Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44709	1
Stark	18-CNT-30	05-19-3988-8	01/16/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44703	1
Stark	18-CNT-32	05-19-3925-8	01/25/19	Disability	Failure to make reasonable accommodation	Unable to locate complainant	Canton	44703	1
Stark	18-CNT-34	05-19-4149-8	02/19/19	Disability	Failure to make reasonable accommodation	Complaint withdrawn by complainant after resolution	Canton	44706	1
Stark	18-CNT-35	05-19-4849-8	03/21/19	Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental		Canton	44709	1
Stark	18-CNT-36	05-19-4788-8	04/16/19	Disability	Failure to make reasonable accommodation	No cause determination	Canton	44703	1
Stark	19-CNT-01	05-20-6659-8	10/02/19	Sex	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44710	1
Stark	19-CNT-02	05-20-6815-8	10/15/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44706	1
Stark	19-CNT-03	05-20-6983-8	10/30/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44704	1
Stark	19-CNT-04	05-20-7038-8	11/04/19	Disability	Failure to make reasonable accommodation		Canton	44707	1
Stark	19-CNT-06	05-20-7296-8	11/21/19	Familial Status	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Canton	44709	1

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Total									439
Stark	19-CNT-07	05-20-7546-8	12/16/19	Sex	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Canton	44704	1
Stark	ADRH3(39985)01092019	05-19-3926-8	01/09/19	Disability	Discrimination in terms/conditions/privileges relating to rental	Conciliation/settlement successful	Canton	44705	1
Stark	ADRH3(40268)07162019	05-19-5970-8	07/16/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Canton	44705	1
Stark	ADRH3(40317)08012019	05-19-6236-8	08/01/19	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Conciliation/settlement successful	Loiusville	44641	1
Stark	AKRH3(40054)02142019	05-19-4593-8	03/14/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation	No cause determination	Canton	44703	1
Stark	AKRH3(40209)03132019	05-19-4688-8	04/09/19	Sex	Discrimination in terms/conditions/privileges relating to sale	No cause determination	North Canton	44720	1
Stark	AKRH3(40374)09092019	05-19-6563-8	09/09/19	Disability, Familial Status, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Canton	44705	1
Stark	AKRH3(40434)10192019	05-20-6895-8	10/19/19	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		North Lawrence	44666	1
Stark	AKRH3(40436)10212019	05-20-7057-8	10/21/19	National Origin, Religion	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable		North Canton	44720	1
Stark		05-20-6756-8	10/10/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44707	1
Stark		05-20-6757-8	10/10/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44707	1
Stark		05-20-6758-8	10/10/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44707	1
Stark		05-20-6759-8	10/10/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44703	1
Stark		05-20-6760-8	10/10/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44707	1
Stark		05-20-6761-8	10/10/19	Race	Discriminatory terms, conditions, privileges, or services and facilities	Conciliation/settlement successful	Canton	44707	1
Summit	Total								45
Summit	ADRH3(40217)05312019	05-19-5433-8	05/31/19	Disability	Discriminatory refusal to rent; Discriminatory advertising, statements and notices; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44333	1
Summit	ADRH3(40312)07312019	05-19-6176-8	07/31/19	Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Failure to permit reasonable modification; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44320	1
Summit	ADRH3(40313)07312019	05-19-6336-8	07/31/19	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Cuyahoga Falls	44221	1
Summit	ADRH3(40347)08232019	05-19-6359-8	08/23/19	Sex, Disability	Discriminatory advertising, statements and notices; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Akron	44320	1
Summit	ADRH3(40357)08302019	05-19-6766-8	08/30/19	Race	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)	Conciliation/settlement successful	Akron	44312	1
Summit	ADRH3(40397)09272019	05-19-6796-8	09/27/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44312	1
Summit	ADRH3(40409)10032019	05-20-6797-8	10/03/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44312	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									439
Summit	ADRH3(40427)10162019	05-20-7039-8	10/16/19	Disability	False denial or representation of availability - rental; Steering; Failure to make reasonable accommodation	Conciliation/settlement successful	Cuyahoga Falls	44221	1
Summit	ADRH3(40428)10162019	05-20-7035-8	10/16/19	Disability	Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44310	1
Summit	ADRH3(40444)10162019	05-20-7036-8	10/16/19	Disability	False denial or representation of availability - rental; Steering; Failure to make reasonable accommodation	Conciliation/settlement successful	Akron	44310	1
Summit	AKRH3(39976)01032019	05-19-4154-8	02/04/19	Race, Religion, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation	No cause determination	Akron	44320	1
Summit	AKRH3(40026)01282019	05-19-4138-8	01/28/19	Familial Status	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental	No cause determination	Barberton	44203	1
Summit	AKRH3(40040)02072019	05-19-4633-8	02/07/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	No cause determination	Akron	44313	1
Summit	AKRH3(40058)02192019	05-19-4672-8	02/19/19	Familial Status	Discriminatory advertisement - rental; Discriminatory terms, conditions, privileges, or services and facilities		Uniontown	44203	1
Summit	AKRH3(40106)03122019	05-19-4670-8	03/12/19	Familial Status	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Barberton	44203	1
Summit	AKRH3(40107)03122019	05-19-5049-8	03/12/19	Disability, Retaliation	Discriminatory advertisement - rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	Not Selected	Stow	44224	1
Summit	AKRH3(40108)03132019	05-19-4677-8	03/13/19	Sex, Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Akron	44314	1
Summit	AKRH3(40119)03182019	05-19-4486-8	03/18/19	Disability	Failure to make reasonable accommodation	No cause determination	Akron	44313	1
Summit	AKRH3(40130)01252019	05-19-4484-8	03/21/19	Race	Discrimination in the terms/conditions for making loans	No cause determination	Stow	44224	1
Summit	AKRH3(40139)03272019	05-19-5300-8	03/27/19	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation	No cause determination	Akron	44312	1
Summit	AKRH3(40142)01252019	05-19-4483-8	03/21/19	Race	Discrimination in the terms/conditions for making loans	No cause determination	Stow	44224	1
Summit	AKRH3(40145)04042019	05-19-5299-8	04/04/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	Not Selected	Akron	44320	1
Summit	AKRH3(40153)04152019	05-19-4867-8	04/15/19	Race, Religion, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)	No cause determination	Akron	44304	1
Summit	AKRH3(40168)04252019	05-19-5088-8	04/25/19	Disability	Failure to make reasonable accommodation	No cause determination	Cuyahoga Falls	44223	1
Summit	AKRH3(40174)04252019	05-19-5076-8	04/25/19	Race, Disability	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Akron	44312	1
Summit	AKRH3(40178)04292019	05-19-5283-8	04/29/19	Race, Sex, Disability, Familial Status	Discriminatory financing (includes real estate transactions); Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Akron	44306	1
Summit	AKRH3(40191)04292019	05-19-5284-8	04/29/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Other discriminatory acts; Failure to make reasonable accommodation		Akron	44306	1
Summit	AKRH3(40220)05082019	05-19-5235-8	05/23/19	Race, Sex	Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable; Discriminatory acts under Section 818 (coercion, Etc.)	Dismissed for lack of jurisdiction	Akron	44320	1
Summit	AKRH3(40224)06072019	05-19-5498-8	06/07/19	Familial Status	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Otherwise deny or make housing unavailable		Tallmadge	44685	1

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Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									439
Summit	AKRH3(40225)06072019	05-19-5509-8	06/07/19	Race, Color, Sex, Familial Status	Discriminatory terms, conditions, privileges, or services and facilities; Steering	No cause determination	Tallmadge	44278	1
Summit	AKRH3(40229)07162019	05-19-5913-8	07/16/19	Color, National Origin, Disability, Retaliation	Discriminatory refusal to rent; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Akron	44314	1
Summit	AKRH3(40258)07022019	05-19-5797-8	07/02/19	Race, Religion, Disability	Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation		Akron	44308	1
Summit	AKRH3(40302)07252019	05-19-6175-8	07/25/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Barberton	44203	1
Summit	AKRH3(40316)08012019	05-19-6418-8	08/01/19	Disability	Other discriminatory acts; Failure to make reasonable accommodation		Akron	44313	1
Summit	AKRH3(40318)08022019	05-19-6357-8	08/09/19	Race	Discrimination in terms/conditions/privileges relating to rental		Twinsburg	44087	1
Summit	AKRH3(40375)09112019	05-19-6768-8	09/11/19	Race	Discrimination in terms/conditions/privileges relating to rental		Akron	44320	1
Summit	AKRH3(40381)09172019	05-19-6596-8	09/17/19	Disability	Otherwise deny or make housing unavailable; Failure to make reasonable accommodation		Akron	44308	1
Summit	AKRH3(40394)09242019	05-19-6896-8	09/24/19	Disability	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Barberton	44203	1
Summit	AKRH3(40399)09272019	05-19-6636-8	09/27/19	Disability, Familial Status	Discriminatory refusal to rent; Discriminatory advertisement - rental; Otherwise deny or make housing unavailable; Failure to make reasonable accommodation	Conciliation/settlement successful	Cuyahoga Falls	44223	1
Summit	AKRH3(40438)08162019	05-20-6855-8	10/21/19	Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Akron	44305	1
Summit	AKRH3(40446)10292019	05-20-7317-8	10/29/19	Race, Familial Status, Retaliation	Discrimination in terms/conditions/privileges relating to rental		Cuyahoga Falls	44223	1
Summit	AKRH3(40492)11182019	05-20-7576-8	11/18/19	Race	False denial or representation of availability; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable		Akron	44305	1
Summit	AKRH3(40506)11292019	05-20-7402-8	11/29/19	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation		Cuyahoga Falls	44223	1
Summit	AKRH3(40508)11292019	05-20-7596-8	11/29/19	Disability	Discriminatory advertising, statements and notices; Discriminatory terms, conditions, privileges, or services and facilities; Failure to make reasonable accommodation		Akron	44312	1
Summit	AKRH3(40524)12112019	05-20-7599-8	12/11/19	Disability, Retaliation	Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Akron	44320	1
Trumbull	Total								5
Trumbull	ADRH3(40208)05252019	05-19-5287-8	05/25/19	Disability	Discriminatory refusal to rent; Failure to make reasonable accommodation	Conciliation/settlement successful	Newton Falls	44444	1
Trumbull	AKRH3(40244)06252019	05-19-6982-8	06/25/19	Race, Disability	Discriminatory advertising, statements and notices; Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.)		Niles	44446	1
Trumbull	AKRH3(40245)05122019	05-19-5669-8	06/28/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation	Conciliation/settlement successful	Niles	44446	1
Trumbull	AKRH3(40383)09172019	05-19-7167-8	09/17/19	Religion	Otherwise deny or make housing unavailable; Refusing to provide municipal services or property		Warren	44483	1
Trumbull	AKRH3(40507)11292019	05-20-7577-8	11/29/19	Disability	Discriminatory advertising, statements and notices		Warren	44485	1
Warren	Total								3
Warren	DAY H6 (28227) 08142019	05-19-6527-8	08/14/19	Sex, Disability, Retaliation	Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Springboro	45066	1
Warren	TOLH2(39972)07122019	05-19-5912-8	07/12/19	Disability, Retaliation	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to make reasonable accommodation		Lebanon	45036	1

APPENDIX 14

Violation County	FHAP Case Number	Case Number - HUD	HUD Filing Date	Bases	Issues	Closure Reason	Violation City	Violation Zip Code	Number Filed
Total									439
Warren		05-19-4411-8	03/15/19	Disability	Failure to provide an accessible route into and thru the covered unit	Complaint withdrawn by complainant after resolution	Maineville	45039	1
Washington	Total								2
Washington	COLH1(47156)05172019	05-19-5781-8	07/10/19	Disability	Discrimination in terms/conditions/privileges relating to rental; Discriminatory acts under Section 818 (coercion, Etc.); Failure to permit reasonable modification		Marietta	45750	1
Washington	COLH1(47346)09222019	05-19-7199-8	09/22/19	Sex, Retaliation	Discriminatory refusal to rent and negotiate for rental; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Marietta	45750	1
Wayne	Total								1
Wayne	AKRH3(40319)08052019	05-19-6239-8	08/05/19	Religion	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Discriminatory acts under Section 818 (coercion, Etc.)		Wooster	44691	1
Williams	Total								3
Williams	TOLH2(39848)06062019	05-19-5189-8	05/06/19	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Bryan	43506	1
Williams	TOLH2(39849)05062019	05-19-5229-8	05/06/19	Disability	Discriminatory refusal to rent and negotiate for rental; Discrimination in terms/conditions/privileges relating to rental; Failure to make reasonable accommodation		Bryan	43506	1
Williams		05-19-4892-8	04/11/19	Disability	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities	No cause determination	Bryan	43506	1
Wood	Total								3
Wood	ADRH2(39651)01182019	05-19-4292-8	01/18/19	Disability	Discriminatory refusal to rent and negotiate for rental; Failure to make reasonable accommodation	Complaint withdrawn by complainant without resolution	Bowling Green	43402	1
Wood	TOLH2(39714)03062019	05-19-4710-8	03/06/19	Color, National Origin	Discrimination in terms/conditions/privileges relating to rental	No cause determination	Perrysburg	43551	1
Wood	TOLH2(40233)11132019	05-20-7275-8	11/13/19	Familial Status	Discriminatory refusal to negotiate for rental; Discrimination in terms/conditions/privileges relating to rental	Complaint withdrawn by complainant after resolution	Pemberville	43450	1
Wyandot	Total								1
Wyandot	TOLH2(39999)05072019	05-19-5434-8	06/12/19	Sex, Retaliation	Discriminatory refusal to rent; Discriminatory terms, conditions, privileges, or services and facilities; Otherwise deny or make housing unavailable; Other discriminatory acts; Discriminatory acts under Section 818 (coercion, Etc.)		Upper Sandusky	43351	1
	Total								1
	AKRH3(40393)06262019	05-19-6524-8	09/19/19	Disability	Discrimination in services and facilities relating to rental; Failure to make reasonable accommodation		Lisbon	44432	1



Development
Services Agency

Appendix 15

Fair Housing Initiatives Program (FHIP) Grants CY 2015 - 2017

APPENDIX 15

Fair Housing Initiatives Program (FHIP) Grants CY 2015-2017

Source: U.S. Department of Housing and Urban Development

Organization	City	Initiative	Amount	Description (from grant application)
Fair Housing Contact Services, Inc.	Akron	FY14 Private Enforcement Initiative – Multi-Year Component	\$325,000	Fair Housing Contact Service, Inc. (FHCS) will use its grant to conduct fair housing investigation and enforcement activities throughout Summit, Stark, Portage, and Medina Counties in northeastern Ohio. FHCS will expand its activities to include systemic housing investigations, promoting AFFH, lending testing, and identification of local policies to remove identified impediments to fair housing choice.
Housing Opportunities Made Equal of Greater Cincinnati, Inc.	Cincinnati	FY13 Private Enforcement Initiative – Multi-Year Component	\$324,530	Housing Opportunities Made Equal of Greater Cincinnati (HOME) will provide comprehensive fair housing enforcement services under, state and local civil rights laws, including investigating client concerns, advising clients on enforcement options, and conducting systemic testing of the housing market. HOME will audit new multifamily construction to ensure compliance with the accessibility requirements of the FHA and review condominium and homeowner association rules for discrimination against families with children. HOME also will train local government departments on fair housing law and conduct advertising and presentations in the community to ensure that residents know their fair housing rights and are aware of HOME’s services. Lastly, HOME will help families with Housing Choice vouchers make integrative moves to neighborhoods of opportunity and sponsor a roundtable to share best practices in building stable integrated communities.
Housing Research & Advocacy Center	Cleveland	FY13 Private Enforcement Initiative – Multi-Year Component	\$325,000	The Housing Research & Advocacy Center (Housing Center) will provide services to all protected class members in Ohio’s Cuyahoga and Lorain Counties with a focus on tasks designed to reduce discrimination against persons with disabilities, African Americans, Hispanic/Latinos, Arab Americans and Muslims, and families with children. Enforcement-related activities will include assisting potential victims of housing discrimination through intake, investigation of complaints, and assistance with the filing of complaints with administrative agencies, fair housing audits, reviews of rental policies and procedures, monitoring housing advertisements for illegal statements, and housing related research reports. Education and outreach activities will include trainings for real estate professionals about fair housing laws, trainings for transitional housing residents and/or providers, and preparation and distribution of quarterly newsletters.

Miami Valley Fair Housing Center, Inc.	Dayton	FY14 Private Enforcement Initiative – Multi-Year Component	\$325,000	<p>The Miami Valley Fair Housing Center, Inc. (MVFHC) will address housing discrimination through ongoing enforcement and education activities. MVFHC will continue to implement systemic investigation and enforcement by intake of allegations of housing discrimination, testing, and other investigative work to provide a just resolution for fair housing discrimination; mediation or other voluntary resolution of allegations of fair housing; and litigation of fair housing cases, including procuring expert witnesses. The target service area is the Dayton MSA, comprised of Montgomery, Greene, Miami, and Preble Counties in Ohio, including expanded activities in underserved areas of the MSA. The project will reach individuals and families in the residential housing market and private and public housing professionals, as well as underserved individuals and all the protected classes under federal, state, and local laws.</p>
Fair Housing Resource Center, Inc.	Painesville	FY14 Private Enforcement Initiative – Multi-Year Component	\$325,000	<p>Fair Housing Resource Center, Inc. (FHRC) will use its grant to continue to conduct a comprehensive enforcement effort within the Lake, Geauga, and Ashtabula County Ohio region that will involve conducting the following types of testing: rental, REO sales, lending, homeowner's insurance, and new construction. FHRC intends to update its methodologies and expand its rental testing program, with a focus the specific protected classes of deaf/hard of hearing individuals, visually impaired individuals, and Housing Choice Voucher recipients. In addition, FHRC will conduct an aggressive review of all homeowner association rules and/or condominium association rules for compliance with the FHA throughout 83 communities. FHRC will hold meetings with local stakeholders and provide information on the obligations to affirmatively further fair housing and the discriminatory impact of some legacy siting standards, legacy residency requirements, and local preference standards. FHRC also plans to expand its educational and outreach services to help promote fair housing and fair lending awareness among all persons within the tri-county area; and this monitoring project will increase the number of meritorious claims submitted to HUD to increase its enforcement efforts.</p>
Fair Housing Opportunities of NW Ohio, Inc.	Toledo	FY15 Private Enforcement Initiative – Multi-Year Component	\$280,000	<p>Fair Housing Opportunities of NW Ohio, Inc. will use its grant to complete the following activities: intake of complaint-based and systemic housing discrimination allegations; research of housing practices to monitor market activities and identify systemic patterns of housing discrimination, including the coordination of testing as part of investigations; resolve housing</p>

				discrimination complaints through mediation, negotiation, administrative complaints, or litigation; assisting persons with disabilities with the submission and successful resolution of reasonable accommodation and modification requests; conduct fair housing education activities, including as a result of cases involving prohibited acts under the Fair Housing Act including case settlements and resolutions; build the organizational capacities of TFHC and other fair housing centers; and monitor outcomes to ensure that respondents/defendants are in compliance with fair housing laws and settlement agreements.
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Fair Housing Contact Services, Inc.	Akron	FY16 Education and Outreach Initiative – General Component -	\$125,000	Fair Housing Contact Service, Inc. (FHCS) will use its grant to conduct fair housing education and outreach activities throughout Summit, Stark, Portage, and Medina Counties in Northeastern Ohio. Further, FHCS will expand current activities to include development of public awareness advertisements, campaigns, billboards, and banners as well as conducting housing rights clinics and trainings and redesign of non-English brochures.
Housing Opportunities Made Equal of Greater Cincinnati, Inc.	Cincinnati	FY16 Education and Outreach Initiative General Component -	\$125,000	Housing Opportunities Made Equal of Greater Cincinnati (HOME) will use their grant to effectively communicate the fair housing message to various audiences in a variety of media. For example, in-person education will be provided for people with disabilities and their families. Consumer presentations will be arranged through partnerships with local agencies that support people with physical and mental disabilities. Further, a television advertising campaign will raise awareness of fair housing rights and encourage people to report discrimination. The campaign will include both paid advertising and a significant amount of time donated by a local television station partnering with HOME. HOME also plans to use social media and online tools such as Google AdWords to ensure that local people doing online searches related to housing see HOME's fair housing related ads. Lastly, HOME is partnering with the Legal Aid Society of Southwest Ohio to host an Emerging Issues in Fair Housing Summit geared to educating service 52 providers of the fair housing rights of the Lesbian, Gay, Bisexual, Transgender and Questioning (LGBTQ) communities and the needs of ex-offenders.
Housing Opportunities Made Equal of Greater Cincinnati, Inc.	Cincinnati	FY16 Private Enforcement Initiative Multi-Year Component	\$300,000	Housing Opportunities Made Equal of Greater Cincinnati (HOME) will use its grant to provide comprehensive fair housing enforcement services to all protected classes under state and local civil rights laws, including investigating client concerns and advising clients on enforcement options, and conducting systemic

				testing of the housing market. HOME will audit new multifamily construction to ensure compliance with the accessibility requirements of the Fair Housing Act and review condominium and homeowner association rules for discrimination against families with children. HOME also will train local government departments on fair housing law and conduct advertising and presentations in the community to ensure that residents know their fair housing rights and are aware of HOME's services. Lastly, HOME will help families with Housing Choice vouchers make integrative moves to neighborhoods of opportunity and sponsor a roundtable to share best practices in building stable integrated communities.
Housing Research & Advocacy Center	Cleveland	FY16 Private Enforcement Initiative – Multi-Year Component -	\$300,000	Housing Research & Advocacy Center (HRAC) will use its grant to provide services to all protected class members in Cuyahoga and Lorain Counties and will focus on activities designed to reduce race, national origin, familial status, and disability-based discrimination. Service delivery will be targeted to reach underserved populations. HRAC's grant activities include: 1) performing 435 fair housing audits for rental, sales, lending, insurance and accessibility; 2) reviewing rental policies and procedures; 3) conducting fair housing trainings for real estate professionals and local government employees; 4) conducting trainings for HUD-funded transitional housing residents and/or providers; 5) assisting potential victims of housing discrimination through intakes, investigation of complaints, direct advocacy, and assistance with the filing of complaints with administrative agencies; 6) monitoring housing advertisements for illegal statements; 7) completing 6 fair housing related research reports; 8) providing a quarterly newsletter; 9) creating a new brochure, updating existing brochures, and having brochures translated; 10) creating and implementing a social media plan; and 11) participating in 6 community resource fairs.
Central Ohio Fair Housing Association, Inc.	Columbus	FY16 Education and Outreach Initiative General Component	\$125,000	The Central Ohio Fair Housing Association (COFHA), the only comprehensive fair housing education program in the Columbus metropolitan area, will use its grant to inform the general public about their rights and obligations under the Fair Housing Act and substantially-equivalent state fair housing laws. COFHA will use professional curricula, brochures, fact sheets, and Public Service Announcements for radio, television, and internet, utilizing localized materials from HUD's national fair housing ad campaigns whenever possible. COFHA will provide Limited English Proficiency (LEP) individuals with information about and access to program benefits through translation and interpretation services in accordance with HUD's published LEP Guidance. The public will be educated through COFHA's fair housing and fair lending

				workshops and will be informed about how to file fair housing complaints to assert their rights under the Fair Housing Act. The project will reach underserved populations including people with disabilities and recent immigrant populations. The project's professional educational symposia will focus on the effective implementation of affirmative fair housing and fair lending strategies and will target property management staff, real estate agents, social workers and discharge nurses who coordinate housing needs, local governments and subsidized housing providers as well as architects, developers and others who make decisions on accessible design and construction.
Ohio State Legal Services Association	Columbus	FY16 Education and Outreach Initiative General Component -	\$125,000	Ohio State Legal Services Association will use its grant to bring comprehensive fair housing education and outreach to 35 Appalachian/rural counties in southeast Ohio. The project will bring together highly experienced rural legal services attorneys, statewide experts working with marginalized populations, and local community groups to provide both broad-based and targeted fair housing education and outreach throughout rural Appalachian Ohio. Through the expertise of statewide advocacy partners, Disability Rights Ohio and the Ohio Poverty Law Center, the project will provide targeted fair housing education and outreach to individuals with disabilities, minority and immigrant communities, and offenders (and their service providers) who are reentering southeast Ohio communities following incarceration. Seventy-five outreach events are planned to provide fair housing education to these targeted groups.
Miami Valley Fair Housing Center, Inc.	Dayton	FY16 Education and Outreach Initiative- General Component -	\$125,000	<p>The Miami Valley Fair Housing Center (MVFHC), the only comprehensive fair housing education program in the Dayton metropolitan area, will use its grant to inform the general public and housing professional about their rights and obligations under the Fair Housing Act and substantially-equivalent state fair housing laws. Further MVFHC will use professional curricula, brochures, fact sheets, and Public Service Announcements for radio, television, and internet, using whenever possible materials from HUD's national fair housing ad campaigns that are lending workshops for localizable. MVFHC will conduct fair housing and fair housing for the public and will provide information on how to file fair housing complaints.</p> <p>The project will reach underserved populations including people with disabilities, people living in rural areas of the MSA and contiguous counties, homeless people and people in self-sufficiency programs, and immigrant populations. The project's professional educational symposia will focus on the effective</p>

				implementation of affirmative fair housing and fair lending strategies and will target financial services staff, property management staff, real estate agents, social workers and discharge nurses who coordinate housing needs, local governments and subsidized housing providers as well as architects, developers and others who make decisions on accessible design and construction. MVFHC will provide Limited English Proficiency (LEP) individuals with information about and access to program benefits through translation and interpretation services in accordance with HUD's published LEP Guidance.
Fair Housing Resource Center, Inc.	Painesville	FY16 Education and Outreach Initiative – General Component	\$125,000	Fair Housing Resource Center Inc., will use its grant to implement a broad based proposal that includes an aggressive and full-service education and outreach project in the Tri-County region of Lake, Geauga and Ashtabula Counties, Ohio that will be completed over the course of a 12-month period. These activities will promote fair housing and fair lending awareness among all persons in the Tri-County area which include: a two-day multi-track conference on fair housing and fair lending; fair housing webinars that will provide a comprehensive overview of key issues related to discrimination in housing; and a Reasonable Accommodation and Assistance animal awareness event. FHRC will expand their seminars to include one intermediate course and one advanced course; host a motorcycle run to raise awareness of discrimination, fair housing and fair lending, and create a Housing Hollie YouTube channel to help encourage fair housing compliance and bring awareness to the current housing issues and rally supporters.
Fair Housing Opportunities, Inc. dba Fair Housing Center	Toledo	FY16 Education and Outreach Initiative – General Component	\$125,000	The Toledo Fair Housing Center (TFHC) will use its grant to conduct activities in order to educate the general public about their rights and responsibilities under the Fair Housing Act, counteract discrimination, and ensure broader knowledge of and access to TFHC's services. TFHC's education and outreach activities will include developing translated educational materials; engaging in increased outreach efforts to individuals with limited English proficiency (LEP individuals); revamping and conducting new and innovative trainings independently and in collaboration with community organizations; redesigning a website to ensure that it is accessible to individuals with disabilities and limited English proficiency; developing a "know your rights" social media campaign; and providing all brochures and advertisements created under the grant to fair housing organizations free of charge through the NFHTA Clearinghouse.

Fair Housing Contact Services, Inc.	Akron	FY2017 Private Enforcement Initiative – Multi-Year Component -	\$300,000	<p>Fair Housing Contact Service, Inc. (FHCS) will use its grant to conduct Fair Housing Investigation and Enforcement Activities throughout Summit, Portage, and Medina Counties in Northeastern Ohio. FHCS will continue delivering comprehensive Fair Housing investigation, testing, and enforcement activities provided under its prior FHIP PEI Multi-Year grant, including the completion of test part, conducting intake, receiving allegations, filing fair housing complaints, and assisting persons with disabilities to receive reasonable accommodations or modifications. As well as continuing these activities, FHCS will also expand activities to develop new systemic housing investigations, conduct sales or lending testing, develop partnerships with educational, medical, and business institutions, and conduct other enforcement related activities.</p>
Fair Housing Resource Center, Inc.	Painesville	FY2017 Private Enforcement Initiative – Multi-Year Component -	\$300,000	<p>Fair Housing Resource Center, Inc. (FHRC) will use its grant to continue to conduct comprehensive enforcement efforts within Lake, Geauga and Ashtabula County Ohio region that involve conducting the following types of testing: rental, rental property management, rental, rental religion/national origin, lending, and new construction. FHRC will implement new testing strategies with a focus on property management companies to help ferret out discriminatory rental practices and expand the reach and presence of the agency in rural communities through our new monthly satellite walk-in clinics. In addition, FHRC will create the following: three rental fact books with a focus on Lake, Geauga, and Ashtabula County, and three State of Fair Housing Reports for Northeast, Ohio. FHRC proposes to hold meetings with local stakeholders and provide information on fair housing obligations through the creation of an AFH tool kit to outline the discriminatory impact of some legacy citing standards, legacy residency requirements, and local preference standards. Also, FHRC plans to expand educational and outreach services by conducting: three Fair Housing seminars to educate local realtors on fair housing and landlord /tenant, three Fair Housing Month seminars, twelve Hispanic Advisory Committee meetings with local organizations to identify local barriers that prevent access to equal housing opportunity and conducting additional outreach to the Tri-county area schools, promoting diversity. The agency will develop an aggressive newly designed marketing campaign to reach underserved populations to help promote fair housing and fair lending awareness among all persons within the tri-county area and this monitoring project will increase the number of meritorious claims submitted to the Department of HUD to increase its enforcement efforts.</p>

Fair Housing Opportunities of NW Ohio, Inc.	Toledo	FY2016 Private Enforcement Initiative – Multi-Year Component	\$300,000	Fair Housing Opportunities of NW Ohio, Inc. will use its grant to continue to conduct intake of complaint-based and systemic housing discrimination allegations, research of housing practices to monitor market activities and identify systemic patterns of housing discrimination, including the coordination of testing as part of investigations; resolve housing discrimination complaints through mediation, negotiation, administrative complaints, or litigation; assisting persons with disabilities with the submission and successful resolution of reasonable accommodation and modification requests; conduct fair housing education activities, including because of cases involving prohibited acts under the Fair Housing Act including case settlements and resolutions; build the organizational capacities of TFHC and other fair housing centers; and monitor outcomes to ensure that respondents/ defendants are in compliance with fair housing laws and settlement agreements.
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