Department of Development

Draft Program Year 2025 Ohio Recovery Housing Program Action Plan Amendment

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Community Services Division

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Draft Program Year 2025 Ohio Recovery Housing Program Action Plan Amendment

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Summary of Changes:

1. Revised definition of Recovery House to reflect Ohio's new definition of Recovery Housing Residence.
2. Removed Ohio MHAS as a partner in general administration of RHP program. Development will now oversee all aspects of program administration.
3. Removed Training & Technical Assistance as a category of funds under this award and transition those funds to Rental Housing Subsidies.

Definitions:

Individual in Recovery[1]: A process of change through which individuals improve their health and wellness, live a self-directed life, and strive to reach their full potential.

Substance Use Disorder[2]: The recurrent use of alcohol and/or drugs causes clinically significant impairment, including health problems, disability, and failure to meet major responsibilities at work, school, or home.

Recovery Housing Residence[3]: Ohio law (R.C. **5119.01**) defines a recovery housing residence as "a residence for individuals recovering from alcohol use disorder or drug addiction that provides an alcohol-free and drug-free living environment, peer support, assistance with obtaining alcohol and drug addiction services, and other recovery assistance for alcohol use disorder and drug addiction.

Alcohol Drug and Mental Health Board [4]: Ohio's county Alcohol, Drug Addiction, and Mental Health (ADAMH) boards are statutorily empowered to plan, develop, fund, manage, and evaluate community-based mental health and addiction services.

Program Year (PY) 2025 Ohio Recovery Housing Program (RHP) Action Plan Amendment Summary:

As outlined in U.S. Department of Housing and Urban Development (HUD) Notice No. FR–6265–N–01 issued on July 21, 2021, grantees will have a single, combined RHP Action Plan for the use of RHP funds, including any and all allocations from existing and future appropriations authorized under the SUPPORT Act. For future allocations, grantees must submit an RHP Action Plan or amendment, including a Form SF–424, application for federal funds, for the allocated funds by Aug. 16 of the fiscal year following the fiscal year in which the funds were authorized. As a result of HUD allocating $1,322,915.00 in PY 2025 RHP funds to the state of Ohio, the state is required to undergo a public participation process to amend the approved Recovery Housing Pilot Action Plan with the RHP Action Plan amendment, as well as any required submissions, due by Aug. 16, 2026. The citizen participation process is outlined under the Citizen Participation Summary section of the plan.

Program Summary:

The Ohio Department of Development, in partnership with the Ohio Department of Mental Health and Addiction Services (OhioMHAS), proposes Ohio's RHP in response to the HUD Federal Register No. FR-6225-N-01.

According to the Centers for Disease Control [5](CDC) in 2019, Ohio had the fourth highest number of overdose deaths in the nation. Under the DeWine Administration, the RecoveryOhio Advisory Council has prioritized supportive housing as an essential recovery resource in our communities and an evidence-based approach that supports multiple pathways, centered on individual choice. Recovery homes are often run by behavioral health providers, peers with lived substance use experience, churches, or other local nonprofits.

[1] Definition from SAMHSA: https://store.samhsa.gov/sites/default/files/d7/priv/pep12-recdef.pdf
[2] Definition from the SAMHSA: https://www.samhsa.gov/find-help/disorders
[3] Definition from the Ohio Revised Code: https://codes.ohio.gov/ohio-revised-code/section-5119.01
[4] Definition from the Ohio Association of Behavioral Health Authorities https://www.oacbha.org/
[5] CDC Overdose Rates Nationwide 2019
https://www.cdc.gov/nchs/pressroom/sosmap/drug_poisoning_mortality/drug_poisoning.htm

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Funding for recovery housing in Ohio is much needed. According to a recent analysis using the Calculating an Adequate System Tool (CAST) developed by the Substance and Mental Health Services Administration (SAMHSA), and adjusted specifically for recovery housing, only 31% of the total recovery housing capacity is being met across Ohio.[6]

OhioMHAS has $3 million in general revenue funding dedicated to recovery housing annually in the state budget. About $2.5 million of this funding is distributed to the 50 local Alcohol Drug and Mental Health boards to assist with the rent and operations costs of recovery housing that meets the state's definition in their local communities. In State Fiscal Year (SFY) 2024, 46 ADAMHS boards supported 212 recovery housing residences and 1,976 beds with these funds. Ohio recovery housing operators are in constant need of additional funds to support low-income individuals entering recovery housing that cannot afford to pay rent. Additional funding from the RHP to assist with rent would allow low-income individuals seeking recovery housing to focus on their treatment or recovery plan in a quality and safe housing environment. Living in recovery housing is beneficial to a person's long-term success in addiction recovery[7]. In the most recent analysis of resident survey data from the Ohio Recovery Outcomes tool, respondents who stayed for at least six months had a greater increase in income, employment, and recovery supports activities. Upon moving out, 91% of move out respondents indicated that they were moving out to their own home, to rejoin their family, move in with a friend, or other stable independent living environment[8].

OhioMHAS has identified the need to provide funding for time limited housing subsidies, not to exceed two years, to low-income individuals who reside in recovery housing residences that meet level I, II or III NARR standards. In accordance with Ohio law as of Jan. 1, 2025, any Recovery Residence receiving funds must be certified by Ohio Recovery Housing (ORH) or chartered by Oxford House. This law was enacted in HB 33 to increase the quality of recovery housing residences in Ohio. As proof of certification, all certified Recovery Housing Residences must be registered with Ohio MHAS's new Statewide Recovery Housing Registry: https://rhsearch.mha.ohio.gov/. To be eligible for RHP funds, Recovery Housing Residences must be on this registry.

Administration Summary:

The RHP will be administered by Development's Office of Housing Support (OHS), which is required to submit the RHP Action Plan for the state of Ohio in HUD's Disaster Recovery Grant Reporting System (DRGR). As indicated in previous years' Action Plans, Development awarded the PY 2020, PY 2021, PY 2022, and PY 2023 RHP allocations through Ohio MHAS, with PY 2024 RHP allocations being awarded directly to ADAMH boards. Development will award PY 2025 RHP allocations directly to county ADAMH boards to carry out the program in accordance with applicable HUD regulations and grant requirements relating to monitoring and management. Development will make awards via a competitive application. Once HUD accepts the RHP Action Plan, HUD and Development will enter a funding agreement. Once HUD transmits the RHP funding agreement to Development, Development will sign and return the funding agreement for HUD's signature.

During the grant period, Development will coordinate receipt of invoices to process draws on the grant within DRGR, as well as collect applicable data for quarterly reporting. Development will also conduct post-grant monitoring of subrecipients to ensure compliance with program regulations. Development will submit annual reports on RHP progress, as required in DRGR.

Development Contacts:

Julie Jarrell

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[6] Green, B. Mapping the Gap: An Assessment of Capacity, Cost-Benefits, and Disparities in Utilization in Ohio Recovery Residences. 2023.

[7] Polcin, D. L., Korcha, R., Bond, J., & Galloway, G. (2010). What did we learn from our study on sober living houses and where do we go from here?. Journal of psychoactive drugs, 42(4), 425–433. https://doi.org/10.1080/02791072.2010.10400705

[8] https://www.ohiorecoveryhousing.org/_files/ugd/195f09_700c5f8846bf48f8a69d05b645648693.pdf

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Use of Funds:

Use of Funds: Federal Fiscal Year (FFY) 2020

Method of Distribution	Amounts
Total Award	$1,225,000.00
Administrative Costs (5%)	$ 61,250.00
Technical Assistance (3%)	$ 34,912.00
Recovery Housing Subsidies	$1,128,838.00

Use of Funds: FFY 2021

Method of Distribution	Amounts
Total Award	$1,060,722.00
Administrative Costs (5%)	$ 53,036.00
Technical Assistance (3%)	$ 30,230.00
Recovery Housing Subsidies	$ 977,456.00

Use of Funds: FFY 2022

Method of Distribution	Amounts
Total Award	$1,147,832.00
Administrative Costs (5%)	$ 57,391.00
Technical Assistance (3%)	$ 32,713.00
Recovery Housing Subsidies	$1,057,728.00

Use of Funds: FFY 2023

Method of Distribution	Amounts
Total Award	$1,387,641.00
Administrative Costs (5%)	$ 69,382.00
Technical Assistance (3%)	$ 39,547.00
Recovery Housing Subsidies	$1,278,712.00

Use of Funds: FFY 2024

Method of Distribution	Amounts
Total Award	$1,322,915.00
Administrative Costs (5%)	$ 66,145.00
Recovery Housing Subsidies	$1,256,770.00

Use of Funds: FFY 2025

Method of Distribution	Amounts

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Total Award	$1,322,915.00
Administrative Costs (5%)	$ 66,145.00
Recovery Housing Subsidies	$1,256,770.00

Eligible Subrecipients:

Individuals eligible for RHP funds must identify as an individual in recovery from and substance use disorder and meet the low-income guidelines in accordance with the stated national objective. All funding will be dispersed directly from Development to a participating local ADAMHS Board that will subcontract with an Ohio Recovery Housing (ORH) or Oxford House certified recovery residence. No payments will be made directly to an individual. Funds will be paid on behalf of individuals until permanent housing is secured or until the certified Recovery Housing Residence deems an individual no longer qualifies for assistance. Subsidy payments will not exceed two years if permanent housing is not secured.

Criteria for Evaluation of Applications and Applicants:

Development will send out a request for application open to all ADAMHS boards across Ohio to apply for RHP funds. Interested ADAMHS boards will need to provide data on the number of individuals intended to serve with the RHP funds and a reasonable request for rental subsidies. Awards will be determined according to estimated need and prior grant performance.

ADAMHS boards receiving RHP funds will be required to collect outcomes data as well as demographic information on all individuals served. Outcomes reporting will include number of individuals served, length of subsidy assistance, and number of recovery residences supported. Data will be given to Development quarterly. Invoices serving as draw requests will be submitted to Development monthly.

Expected and Effective Operations of Recovery Housing:

All RHP HUD-recognized recipients who operate these projects have a range of philosophies and practices. In Ohio, a recovery housing residence is a residence for individuals recovering from alcohol use disorder or drug addiction that provides an alcohol-free and drug-free living environment, peer support, assistance with obtaining alcohol and drug addiction services, and other recovery assistance for alcohol use disorder and drug addiction. Within the context of RHP, client choice is paramount. Traditionally, HUD-funded homeless agencies must utilize a harm reduction model, but within this context, many clients need sober environments to maintain their sobriety. To that end, as feasible, within this funding, there can be a sobriety requirement as a condition. Outside of that requirement, agencies receiving RHP funding must operate with the practices and policies described below:

- Develop projects with input from the recovery community.
- Provide meaningful choices to persons experiencing homelessness in all stages of recovery and connect participants unable to presently maintain sobriety to more appropriate housing.
- Allow residents to participate in community activities of their choosing.
- Employ individuals in recovery.
- Have low barriers to entry.
- Have termination policies that include documenting rule violations and show attempts to support the participant in compliance with occupancy agreements and/or leases.
- Focus on outcomes related to housing stability and minimizing returns to homelessness.
- Have policies and operations that ensure individual rights of privacy, dignity and respect, and freedom from coercion and restraint, optimizing autonomy and independence in making life choices.

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Community Development Block Grant (CDBG) Limited Clientele National Objective:

All RHP activities must comply with the Limited Clientele National Objective, as modified by Federal Register Notice (FR-6225-N-01) and must support activities that benefit low- and moderate-income (LMI) persons. Grantees may not use RHP funds to aid in the prevention or elimination of slums or blight or for activities designed to meet urgent needs. Benefit to LMI persons through limited clientele activities includes activities that benefit persons that are "presumed" to be of LMI or are qualified based on data about family size and income.

Environmental Review 24 CFR Part 58 Requirements:

Development has determined the proposed activities included as part of this substantial amendment are categorically excluded as they will not alter any conditions that would require a review or compliance determination under the federal laws and authorities cited in §58.5. The responsible entity does not have to publish a Notice of Intent (NOI) to Request Release of Funds (RROF) or execute a certification and the recipient does not have to submit an RROF to HUD (or the state). Following the award of assistance, no further approval from HUD or the state will be needed with respect to environmental requirements. The recipient remains responsible for carrying out any applicable requirements under §58.6.

A Certification of Categorical Exclusion Project Not Subject to §58.5 Form is required to receive a Release of Environmental Conditions from the State of Ohio prior to undertaking the activity.

Violence Against Women Act (VAWA) Requirements:

On March 15, 2022, the President signed into law the Consolidated Appropriations Act of 2022 (Pub. L. 117-103, 136 Stat. 49), which included the Violence Against Women Act Reauthorization Act of 2022 (VAWA 2022), regarding housing protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA 2022 prohibits an applicant for assistance or tenant assisted with RHP from being denied assistance under, denied admission to, terminated from participation in, or evicted from housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, so long as the applicant otherwise qualifies for admission, assistance, participation or occupation (24 CFR 5.2005 (b)(1)).

In addition, VAWA 2022 requires each housing provider produce a detailed emergency transfer plan, which ensures that a tenant receiving rental assistance through or residing in a unit subsidized under an RHP housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer within the criteria stated in 24 CFR 5.2005 (e)(2). RHP housing providers must maintain records on emergency transfers requested under 24 CFR 5.2005(e). Documentation of emergency transfer requests can be completed using the optional HUD Form 5383 located at https://www.hud.gov/program_offices/housing/mfh/violence_against_women_act. RHP housing providers are responsible to track data on the outcomes of each request and must be able to provide to Development upon request. All RHP rental assistance activities must provide applicants and participants the RHP Notice of Occupancy Rights under the VAWA form. Rental assistance programs must provide copies of the HUD forms to the property owner or manager at the time of lease-up.

Compliance with Anti-Discrimination Laws.

RHP housing providers are required to comply with all applicable Federal anti-discrimination laws, including Title VI of the Civil Rights Act of 1964.

Pre-award/Pre-Agreement Costs:

Development has decided that pre-award or pre-agreement costs will not be eligible for reimbursement with RHP funds. No funds will be released until the RROF has been issued by Development.

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Anticipated Outcomes and Expenditure Plan:

Development will comply with all RHP guidelines and expend at least 30% of the funds within one year from the date when funds are made available. We anticipate meeting the requirement that all funds be fully expended by Sept. 1, 2032. Administrative costs will not exceed the 5% cap. The administrative funds in the plan will be used to cover the costs of administering the grant on the local level. ADAMHS boards who participate in the grant will be able to request no more than 5% of their grant award to keep at the board level for grant administration and/or to pass down to sub awarded recovery housing residences. Any additional administrative costs will be covered by separate funding sources.

Grantees will be required to complete ORH's outcomes tool for all residents living in the recovery home. The outcomes survey is a resident-driven survey completed at move-in, six months, and discharge. Along with completing the outcomes, tool grantees will be required to report the total number of individuals assisted in RHP activities and the number individuals able to transition to permanent housing through RHP-assisted temporary housing annually. It is anticipated that the following objectives will be met through each year of funding:

Objective	Projected Outcome
Number of individuals who gain access to quality recovery-focused housing	650
Number of individuals who transition to permanent housing after receiving RHP subsidy	200
Number of individuals connected to ongoing recovery support services to maintain recovery upon leaving the recovery home	520

When all RHP funding for FFY 2020-FFY 2025 is expended, the projected minimum number of individuals who will gain access to quality recovery-focused housing is estimated to be 3,250; the projected minimum number of individuals who transition to permanent housing after receiving RHP subsidy is estimated to be 1000; and the projected minimum number of individuals connected to ongoing recovery support services to maintain recovery upon leaving the recovery home is estimated to be 2,600.

Citizen Participation Summary:

In accordance with 24 CFR 91.105(a)(3) and 91.115(a)(3) concurrently to address RHP funds, and to allow no less than 15 calendar days for public comment, the State of Ohio's Consolidated Plan citizen participation plan has been amended. The RHP Action Plan citizen participation plan amendment has been included as part of the RHP Action Plan Public Comment Period Memo located at https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan.

PY 2020/2021 RHP Action Plan Substantial Amendment Citizen Participation Process

Development hosted a public hearing on the RHP Action Plan on Dec.1, 2021, at 10:30 a.m. in the Riffe Center in Room 1932 and via Webex. Interested parties were able to submit oral or written testimony at any time during the public comment period that took place from Nov. 23, 2021, to Dec. 10, 2021.

PY 2022 RHP Action Plan Substantial Amendment Citizen Participation Process

As part of the RHP Action Plan Substantial Amendment as a result of the allocation of PY 2022 RHP funds, interested parties were allowed to submit written testimony via email to Ian.Thomas@development.ohio.gov any time during the 15-day public comment period beginning Sept. 1,

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2022. Interested parties submitted written comments no later than 11:59 p.m. on Sept. 16, 2022. Questions regarding the plan or comment process were emailed to Ian Thomas at Ian.Thomas@development.ohio.gov.

As part of the first substantial amendment associated with the PY 2022 allocation, Development hosted a public hearing on the PY 2022 RHP Action Plan substantial amendment on Sept. 7, 2022, at 10:15 a.m. in Columbus, OH. No comments were received during this hearing or during the comment period.

PY 2023 RHP Action Plan Substantial Amendment Citizen Participation Process

Development hosted a public hearing on the PY 2023 RHP Action Plan substantial amendment on Sept. 19, 2023, at 10:30 a.m. in Columbus, Ohio. Interested parties were able to submit oral or written testimony at that time. No comments were received during this hearing or during the comment period.

PY 2024 RHP Action Plan Substantial Amendment Citizen Participation Process

Development hosted a public hearing on the PY 2024 RHP Action Plan substantial amendment on Jan. 29, 2025, at 10:30 a.m. in Columbus, Ohio. Interested parties were able to submit oral or written testimony at that time. No comments were received during this hearing or during the comment period.

PY 2025 RHP Action Plan Substantial Amendment Citizen Participation Process

As part of the RHP Action Plan Amendment as a result of the allocation of PY 2025 RHP funds. Development will allow interested parties to submit written testimony via email to OHS@development.ohio.gov any time during the 15-day public comment period beginning Feb. 9, 2026 Interested parties must submit written comments no later than 11:59 p.m. on Feb. 24 , 2026. Questions regarding the plan or comment process should be emailed to Development at OHS@development.ohio.gov.

As part of the substantial amendment associated with the PY 2025 allocation, Development hosted a public hearing for the Draft PY 2025 RHP Action Plan substantial amendment on Feb. 24, 2026, at 10:30 a.m. in Columbus, at the location listed below. No comments were received during this hearing or during the comment period.

Public Hearings relating to RHP took place at:

Riffe Center
77 S. High St, Floor 19
Columbus Ohio, 43215

Partner Coordination:

Governor Mike DeWine commissioned the RecoveryOhio initiative in January 2019 to coordinate the work of state departments, boards, and commissions by leveraging Ohio's existing resources and seeking new opportunities[9]. While engaging local governments, coalitions, and task forces, RecoveryOhio's goals are to create a system to help 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, and work with local law enforcement to provide resources to fight illicit drugs at the source.

The RecoveryOhio Housing subcommittee includes members from the departments of Health, OhioMHAS, Development, Medicaid, Job and Family Services and Rehabilitation and Corrections, Ohio Housing Finance Agency, Opportunity for Ohioans with Disabilities, and the Social Work and Counselor Board. The subcommittee is tasked with reviewing and creating a comprehensive statewide plan for safe, affordable, and quality housing

[9] Recovery Ohio information from https://recoveryohio.gov/wps/portal/gov/recovery/about/overview

that will meet the needs of individuals with mental health and substance use disorders so they can fully participate in community and family life. The plan will include supported housing options, transitional housing, recovery housing, adult care facilities, and short-term stabilization options to provide housing stability and choice. The plan will recognize that housing for people with mental health and substance use disorders will allow for and coordinate with treatment providers to ensure alignment of individuals' treatment plans, including medications. This plan must consider the housing barriers faced by people who have criminal records and evaluate options for individuals who may not be able to live independently to provide the highest quality of life possible.

In 2019, the local ADAMHS boards completed a housing needs assessment. The results are in the tables below.

Wait List Data as Reported on Housing Needs Assessment, Statewide, SFY 2017

Housing Category	Ave. Min Wait Time	Ave. Max Wait Time	Ave. Number of People on Waitlist
Recovery Housing Level 1	125.3	168	167.5
Recovery Housing Level 2	23.9	35.8	11
Recovery Housing Level 3	49	63.6	35.8

Housing Resources Needed: Clients with Substance Use Diagnosis Only* Statewide

Housing Category	Single Adults	Criminal Justice	Families	Opiate Use	Pregnant Women	Transition Age Youth
Recovery Housing Level 1	200	10	0	8	1	5
Recovery Housing Level 2	363	0	12	25	31	15
Recovery Housing Level 3	10	0	0	0	0	10

* May represent either units or beds needed depending on category

In 2024, Ohio Recovery Housing [10] released a funding needs and cost benefit analysis for Recovery Housing Residences in Ohio. This release highlights the need for additional funds to support the current recovery housing residences in Ohio.

NARR Level	Average Annual Cost per Resident	Percent of Revenue from Rent	Revenue from other Grants, Donations, Etc.	Revenue Needed per Resident	Total Capacity Needed	Current Capacity	Capacity Gap	Annual Funds Needed to Meet Capacity
Level 1	$8,000	70%	10%	$1,600	5,769	456	5,313	$8,500,800
Level 2	$11,000	50%	10%	$4,400	11,672	3,785	7,887	$34,702,800
Level 3	$13,900	10%	10%	$11,120	2,148	1,789	359	$3,992,080

Resources:

The total amount of Ohio's RHP funds for FY 2020 is $1,225,000, FY 2021 is $1,060,722, FY 2022 is $1,147,832, FY 2023 is $1,387,641, FY 2024 is 1,322,915 and FY 2025 is $1,322,915.

Additional federal and state resources available to RHP grantees include State Opioid and Stimulant Response (SOS) funding, Recovery Housing Initiative funds from Ohio's general revenue fund, tax credits through Ohio Housing Finance Agency (OHFA) and Housing Development Gap Financing with Ohio Housing Trust Fund dollars.

[10] Cost benefit analysis information from Investing in Recovery: Funding Needs and Cost-Benefit Analysis for Sustainable Housing Solutions (ohiorecoveryhousing.org)

ADAMHS Board local levy funds may be available at the local level depending on the county the RHP project is located. Private resources available to grantees include income generated from resident rent.

Subrecipient Management and Monitoring:

All grantees will be subject to following the SUPPORT Act management and monitoring requirements as outlined in HUD Notice No. FR–6265–N–01 issued on July 21, 2021. Subrecipients subject to the audit requirements of 2 CFR Part 200, Subpart F are required to submit to Development a copy of their audit(s) covering the period of the sub-award. If Subrecipient is not subject to the audit requirements of 2 CFR Part 200, Subpart F, Subrecipient shall submit to Development a copy of its annual financial audit(s) or review(s) covering the period of the sub-award within the earlier of 30 days after receipt of the auditor's report(s) or nine months after the end of the audit period, or such longer period as is agreed to in advance by Development, unless a waiver of this requirement is approved in advance by Development[2 CFR Part 200, Subpart F].

Standard Form 424 and 424D:

The 424 Forms for PY 2020, PY 2021, PY 2022, PY 2023 and PY 2024 have been signed by the director of the Department of Development and have been included as part of the initial submittal to HUD. The PY 2025 424 Forms will be included as part of the RHP Action Plan Amendment submittal to HUD. In addition to the 424 Forms the RHP State Certifications have been included as part of the final submittal.

Public Comments and Responses:

As indicated in the amended citizen participation plan memo, the public comment period as part of the initial RHP Action Plan (PY 2020 and PY 2021) took place from Nov. 23, 2021, to Dec. 10, 2021, with the public hearing held on Dec. 1, 2021. The PY 2023 RHP Action Plan Amendment Public Comments and Responses have been included as part of the final submittal to HUD. The memo announcing the public participation opportunities, as well as the amended citizen participation plan was located at https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan.

Attendance

Name	Attendee Email
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Shana Garrett	shana.garrett@development.ohio.gov
Dirk Lackovich-Van Gorp	dlackovich-vangorp@clarkcountyohio.gov

The following comments were received during the public comment period or at the public hearing:

Comment #1

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Ohio Recovery Housing

35 E. Gay Street, Suite 401 | Columbus, OH 43215
614-453-5133 (office) | 614-228-0740 (fax)
www.OhioRecoveryHousing.org

November 30, 2021

Ian Thomas
Office of Community Development
Riffe Center, 26th Floor
77 South High St
Columbus, OH 43215
Via Email: Ian.Thomas@development.ohio.gov

Dear Ian Thomas:

Thank you for the opportunity to provide comment on Ohio's Recovery Housing Program Action Plan. My name is Danielle Gray and I serve as Executive Director of Ohio Recovery Housing. It is our mission to increase access to quality recovery housing for Ohioans with substance use disorders. Quality recovery housing provides not only a safe, healthy, and affordable housing environment, but ensures that residents of the recovery home have peer support and connection to needed treatment and recovery support services in the community.

We know that recovery housing works. Ohio Recovery Housing has been collecting data on resident outcomes using a resident survey since 2016. A recent analysis of the survey results demonstrates the impact of recovery housing. 91% of residents who move out of recovery housing were moving out to their own home, rejoin their family, move in with a friend or other stable and independent living environment. 98% of residents indicate that they are connected to an ongoing recovery support that is likely to continue after they have left recovery housing. Only 21% of residents were employed when they moved into recovery housing, compared to 52% of residents at move out. A little less than half (48%) of residents had no income when they moved into recovery housing compared to only 33% of move-out respondents. These results indicate that residents of recovery housing not only provides support for recovery, but also helps residents gain employment, increase income, and build lasting recovery capital for their future.

Now more than ever, it is critical to ensure access to high quality recovery housing options for Ohioans with substance use disorders. As Ohio faces a growing addiction epidemic, this recovery support is going to be even more critical. We know that the COVID-19 pandemic has exacerbated the addiction crisis, causing an increase in statewide overdoses and overdose deaths. In addition to opiate related overdoses and overdose deaths, we are seeing a concerning rise in misuse of alcohol and those seeking treatment for alcohol use disorder. Fifty-seven (57%) of respondents in the recovery housing resident survey are in recovery from alcohol use disorder.

We thank the Ohio Department of Development and the Ohio Department of Mental Health and Addiction Services for using these funds to advance equity. As noted in Ohio's Recovery Housing Environmental Scan dated 2021, we know that there are many populations who are underserved or unserved by quality recovery housing, including those listed in the action plan such as Ohioans who identify as LGBTQIA, Ohioans of color, and rural Ohioans. By prioritizing these populations Ohio can

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www.OhioRecoveryHousing.org

expand access to quality recovery housing for these communities that are currently unserved or underserved.

In addition, parents whose minor children live with them are a largely underserved population. The types of buildings and structures that are needed to effectively serve this population are expensive to build and maintain. The funding made available in the action plan would allow communities to build these types of structures and allow for an increase in access to parents in recovery, leading to benefits for both the parents and their children.

We are also excited to see that there is a plan to not only create new housing, but to increase the quality of existing recovery housing in Ohio – ensuring that these dollars are used to benefit the most Ohioans. Ohio Recovery Housing provides a voluntary certification process for recovery homes in Ohio. We review the organization's policies and procedures, perform a program interview, as well as review the physical dwelling to ensure that the property meets or exceeds the standards as outlined by the National Alliance of Recovery Residences.

As the certification is voluntary there are many recovery homes in Ohio that remain uncertified. When we ask about barriers to certification, homes often mention the costs of certification. This is not only the certification fee, which averages about $600 per year for the two-year certification, but also the costs of making needed repairs and upgrades to homes. These repairs can range from installing appropriate egress windows, installing doors, improving plumbing or installing appliances and many other repairs that are not considered capital expenses but are often out of reach for recovery housing operators.

The draft action plan would provide much needed resources for recovery homes to apply for resources that would allow the physical property to meet quality standards and earn certification. Therefore, this draft plan will not only increase access by creating new housing that will be targeted to underserved communities, but also increase the quality of existing recovery housing, ensuring more Ohioans have access to a recovery home that is safe, healthy, supportive, and affordable.

We do have one recommendation for the plan. As written, the plan would only allow funding to go to organizations who are getting initially certified. ORH certifies properties, not organizations. So, there are many organizations which have some of their properties certified and others remain uncertified. Mostly, due to the reasons listed previously. These properties remain uncertified due to the costs of needed repairs or upgrades to the homes. We ask that this be clarified so the funding is for *properties* that are earning initial certification. This would allow organizations that have some properties certified but others uncertified to have all their properties certified with Ohio Recovery Housing.

Additionally, certified homes must maintain quality in order to keep their certification. ORH performs a quality review that includes a policy and procedure review, interview and dwelling review of the properties once every two years. Even quality recovery homes can experience a need for a major repair and face financial hardship in addressing the need for the repair. If the home cannot afford the repair, they risk losing their certification. Therefore, we also recommend allowing currently certified

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homes who participate in the recertification process to also apply for funding if there is an identified need for an improvement during the recertification process.

We understand that newer homes often do not have access to the same resources, so newer homes should be provided with preference. However, we ask that if there are any dollars remaining after those seeking initial certification receive funds, that existing certified recovery homes be able to access any remaining dollars to address quality improvements that are needed for them to maintain their certification after participating in their recertification review.

Thank you for your consideration and your dedication to quality recovery housing. We look forward to working with you and OhioMHAS on implementing the draft plan.

I would be happy to answer any questions that you may have for me. I can be reached at danielle@ohiorecoveryhousing.org or 614-453-5133.

Danielle Gray

Danielle Gray
Executive Director

Response #1

Thank you for taking the time to submit a comment on Ohio's Recovery Housing Plan. We are taking ORH's recommendations into consideration regarding funding being used for "properties" instead of organizations and the extension of allowability to include properties seeking a renewal of their quality certification. In terms of covering certification costs with these funds we would need to have a deeper conversation regarding the certification fee.

Comment #2

The Ohio Council
Of Behavioral Health & Family Services Providers

17 S High Street, Suite 799, Columbus, OH 43215
614-228-0747 | www.TheOhioCouncil.org
@theohiocouncil

December 2, 2021

Ian Thomas
Ohio Department of Development
Riffe Center, 77 S. High Street
Columbus, OH 43215

Delivered via email to: ocd@development.ohio.gov

Dear Mr. Thomas:

Thank you for the opportunity to provide comments on Ohio's Recovery Housing Program Action Plan. My name is Teresa Lampl and I serve as Chief Executive Officer of the Ohio Council of Behavioral Health and Family Services Providers (The Ohio Council), representing more than 160 organizations that offer prevention, addiction treatment, mental health care and family services.

The Ohio Council envisions the establishment and maintenance of a well-financed full continuum of care that includes access to prevention, treatment and recovery supports for all Ohioans.

We know that recovery housing is an essential component of the behavioral health care continuum of care. A recent analysis from a survey performed by Ohio Recovery Housing demonstrates the impact of recovery housing. 91% of residents who move out of recovery housing were moving out to their own home, rejoin their family, move in with a friend or other stable and independent living environment. 98% of residents indicate that they are connected to an ongoing recovery support that is likely to continue after they have left recovery housing. Only 21% of residents were employed when they moved into recovery housing, compared to 52% of residents at move out. A little less than half (48%) of residents had no income when they moved into recovery housing compared to only 33% of move-out respondents. These results indicate that residents of recovery housing not only provide support for recovery, but also help residents gain employment, increase income, and build lasting recovery capital for their future.

We thank the Ohio Department of Development and the Ohio Department of Mental Health and Addiction Services for using these funds to advance equity. Many populations in Ohio are underserved or unserved by quality recovery housing, including those listed in the action plan such as Ohioans who identify as LGBTQIA, Ohioans of color, and rural Ohioans.

In addition, parents whose minor children live with them are a largely underserved population. The types of buildings and structures that are needed to effectively serve this population are expensive to build and maintain. The funding made available in the action plan would allow communities to build these types of structures and allow for an increase in access to parents in recovery. We know that this will lead to long lasting benefits for both parents and their children.

The draft action plan also includes much needed resources for recovery homes to increase quality. The draft plan allows recovery homes in Ohio to assess their quality needs and apply for funding that will help them address those needs.

Accordingly, the Ohio Council is proud to support the draft action plan. It is sound policy that will invest in new housing targeted to underserved communities, while also aiming to strengthen the quality of existing recovery housing – ensuring more Ohioans have access to safe, healthy, supportive, and affordable recovery housing.

Thank you for your consideration and your dedication to quality recovery housing.

Sincerely,

Teresa Lampl

Response #2

OCD appreciates the public comment provided.

PY22 RHP Amendment Citizen Participation Process

The public comment period as part of the RHP Action Plan Amendment based on PY 2022 funding took place from Nov. 23, 2021 to Dec. 10, 2021, with the public hearing held on Dec. 1, 2021. The PY 2022 RHP Action Plan Amendment Public Comments and Responses will be included as part of the final submittal to HUD. The memo announcing the public participation opportunities, as well as the amended citizen participation plan was located at https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan.

PY23 RHP Amendment Citizen Participation Process

The public comment period as part of the PY23 RHP Action Plan Substantial Amendment based on PY 2023 funding took place from Sep. 15, 2023 to Sep. 30, 2023, with the public hearing held on Dec. 1, 2021. The PY 2022 RHP Action Plan Amendment Public Comments and Responses have been included as part of the final submittal to HUD. The memo announcing the public participation opportunities, as well as the amended citizen participation plan was located at https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan.

DRAFT

Ohio Recovery Housing

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September 18, 2023

Ian Thomas
Office of Community Development
Riffe Center, 26th Floor
77 South High St
Columbus, OH 43215
Via Email: Ian.Thomas@development.ohio.gov

Dear Ian Thomas:

Thank you for the opportunity to provide comments on Ohio's Draft Program Year 2023 Ohio Recovery Housing Program Action Plan Amendment.

My name is Danielle Gray and I serve as Executive Director of Ohio Recovery Housing. It is our mission to increase access to quality recovery housing for Ohioans with substance use disorders. Quality recovery housing provides not only a safe, healthy, and affordable housing environment, but ensures that residents of the recovery home have peer support and connection to needed treatment and recovery support services in the community.

We know that recovery housing works. Ohio Recovery Housing has been collecting data on resident outcomes using a resident survey since 2016. A recent analysis of the survey results demonstrate the impact of recovery housing. 97% of recovery housing residents who lived in recovery housing for at least six months reported no use of alcohol or illicit substances in the past 30 days. We also see increases in employability- with 17% of residents who stayed in recovery housing for at least six months achieving a high school diploma or equivalent and 5% achieving a technical or vocational certification. We also see that over 78% of residents are employed upon moving out.

Now more than ever, it is critical to ensure access to high quality recovery housing options for Ohioans with substance use disorders. According a statewide "Mapping the Gap" analysis. Ohio is only meeting 31% of the needed capacity for recovery housing services statewide. This critical shortage means fewer Ohioans and communities have access to critical recovery support needed to address the addiction epidemic.

Recovery housing is not an eligible benefit under Medicaid or private insurance, and publicly available resources for this recovery support are extremely limited. As noted in Ohio's Recovery Housing Environmental Scan dated 2021, even when public funds are available they may be restricted to only assist Ohioans with specific addictions. 87% of recovery homes rely at least in some part on resident rent payments to ensure financial stability of the organization. Allowing these funds to be used for rental subsidies will support many Ohioans no matter their specific medical diagnosis access quality recovery housing options that meet their individual needs.

Ohio Recovery Housing also supports efforts to ensure quality in housing, and we are supportive of the plan's efforts to ensure that the plan funds are used in accordance with the new guidelines that

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were recently passed in HB 33 which would require quality certification by either Oxford House or Ohio Recovery Housing in order to secure funds. Certification requirements ensure that individuals are living in environments that are safe, supportive and healthy and that resident rights are protected.

Funds were previously allocated towards a recovery housing repairs fund. Dollars are still needed for critical repairs for recovery homes in Ohio. Ohio recently passed HB 33, the state budget bill. This budget bill will require recovery homes to meet standards for quality to receive funding, get referrals for community mental health or addiction treatment providers, or advertise that they are recovery housing, sober living, or other illicit drug and alcohol-free housing.

We are anticipating that many recovery homes that exist currently in Ohio will not meet standards for quality with regards to physical property and will need resources to bring their properties up to quality standards. These funds were a critical way that Ohio was meeting its commitment to operators that there would a be a "stairway up to quality" instead of an abrupt cliff.

ORH is grateful that other funds have been allocated for these resources for one year. However, the new requirements go into effect January 1, 2025. By the time many operators are aware of the new requirements and directly impacted, funds are likely to be exhausted and there is currently no plan to assist these operators in ensuring that their physical property can meet nationally recognized standards for quality.

Additionally, many existing, certified recovery homes also struggle with the increasing costs of physical property improvements that are needed to maintain quality certification. These operators were left out of previous funding decisions, and many are at risk of loosing certification due to needed repairs and maintenance of physical property – potentially leading to a decrease in recovery housing options.

While we support the provision of subsidies, we also encourage that funds are made available beyond next year for critical recovery housing repairs for both new and existing certified recovery housing operators.

I would be happy to answer any questions that you may have for me. I can be reached at danielle@ohiorecoveryhousing.org or 614-453-5133.

Danielle Gray

Danielle Gray
Executive Director

ON OUR WAY HOME, INC.

Providing opportunities to build healthy and purposeful lives for those in recovery from addiction

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Emily Schwarz

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Board Chair

Larry Weber

September 15, 2023

Ian Thomas
Office of Community Development
Riffe Center, 26 th Floor
77 South High St
Columbus, OH 43215
Via Email: Ian.Thomas@development.ohio.gov

Dear Ian Thomas:
Thank you for the opportunity to provide comments on Ohio's Recovery Housing Program Action Plan. My name Barbara Isemann and I founded our nonprofit and operate two Level 2 recovery residences in Clermont County at the request of our county MHAS director, opening our doors in 2022.

Quality recovery housing provides not only a safe, healthy, and affordable housing environment, but ensures that residents of the recovery home have peer support and connection to needed treatment and recovery support services in the community.

We know that recovery housing works and our residents are very grateful for the opportunity to rebuild their lives. Now more than ever, it is critical to ensure access to high quality recovery housing options for Ohioans with substance use disorders. According a statewide "Mapping the Gap" analysis. While Ohio meets 83% of Level 3 housing (support staff on site), it only meets 32% of Level 2 housing (less support than level 3, for instance adults coming out of a 30-90day inpatient rehabilitation program, and a mere 8% for Level 1 housing (some sobriety traction and recovery capital under their belt and stable employment). This critical shortage means fewer Ohioans and communities have access to critical recovery support needed to address the addiction epidemic.

Recovery housing is not an eligible benefit under Medicaid or private insurance, and publicly available resources for this recovery support are extremely limited. As noted in Ohio's Recovery Housing Environmental Scan dated 2021, even when public funds are available they may be restricted to only assist Ohioans with specific addictions.

We currently receive rent subsidy from our county MHAS board for our Level 2 residents who mostly enter our doors with no employment. It enables us to offer the first six weeks rent free and gives the resident time to procure at least part-time employment.

Our homes are nearing capacity with no decrease in applications. Our concerns now are for transitional next steps for stable residents that are ready to be more independent but still

desire to live in a safe and sober environment with like-minded individuals. There are no Level 1 recovery residence options like this in our entire county.

At the time of drafting these comments, the draft plan was not available to the public, so I have not had time to review the exact language. However, I do want to encourage that the plan contains requirements that the homes provided with funding be required to meet standards for quality to access subsidies.

Funds were previously allocated towards a recovery housing repairs fund. Dollars are still needed for both purchase of new homes and critical repairs and maintenance for existing recovery homes in Ohio. While I support the provision of subsidies, I also encourage that funds are made available beyond next year for critical recovery housing maintenance and repairs for both new and existing certified recovery housing operators.

I would be happy to answer any questions that you may have for me. May God bless you for your public service!

Kindly,

Barbara Isemann

Barbara Isemann, R.Ph. Executive Director
On Our Way Home, Inc.
513-520-4421
www.OnOurWayHome.org

Response

Thank you for taking the time to submit a comment on Ohio's Recovery Housing Program Action Plan Substantial Amendment. We are taking the recommendations into consideration regarding funding being used for critical recovery housing maintenance and repairs for both new and existing certified recovery housing operators in the future. Development continues to seek out creative funding solutions to address additional concerns in the recovery housing realm.

PY24 RHP Amendment Citizen Participation Process

The public comment period as part of the PY24 RHP Action Plan Substantial Amendment based on PY 2024 funding took place from Jan. 16, 2025 to Jan. 31, 2025. There were no comments received on the PY 2024 RHP amendment. The memo announcing the public participation opportunities, as well as the amended citizen participation plan was located at https://development.ohio.gov/wps/portal/gov/development/community/community-resources/ohio-consolidated-plan.

Appendix:

OhioMHAS Agreements and Assurances for Grantees FY 2022
https://mha.ohio.gov/static/SupportingProviders/ApplyforFunding/ForCurrentAwardees/2022/FY2022-Agreements-and-Assurances.pdf

OhioMHAS Community Capital Assistance Project Application FY 2019-2024
https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/CapitalPlanning/Community-Capital-Plan-FY19-24-Memo-and-Worksheets.pdf?ver=2018-12-14-110627-587

OhioMHAS Community Capital Assistance Projects Process Guidelines
https://mha.ohio.gov/static/Portals/0/assets/SchoolsAndCommunities/CommunityAndHousing/Community-Planning/2019/CAPITAL.GUIDELINES_rev_April2019.pdf?ver=2019-08-09-132425-143

OhioMHAS Community Plan Guidelines FY 2021-2022 https://mha.ohio.gov/wps/wcm/connect/gov/95787a7c-22b5-4714-9ded-defb3a2e5222/Final+Community+Plan+Guidelines+for+2021-2022+.pdf?MOD=AJPERES&CVID=nMjhYZ.

Ohio Recovery Housing's Assurances https://63f78b26-80cc-40a7-b987-4819ba5e1208.filesusr.com/ugd/3c8c7e_3762097efb4b4eada190dc9985e0e6ba.pdf

Ohio Recovery Housing's Steps to apply for Certification https://www.ohiorecoveryhousing.org/applying-for-certification

Ohio Recovery Housing's Cost Benefit Analysis Investing in Recovery: Funding Needs and Cost-Benefit Analysis for Sustainable Housing Solutions (ohiorecoveryhousing.org)

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