

Executive Summary

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

1. Introduction

The City of Mansfield receives funding annually from the United States Department of Housing and Urban Development (HUD) for implementation of the Community Development Block Grant Program (CDBG) and the HOME Investment Partnerships Program (HOME). As a requirement of receiving HUD program funds, the City of Mansfield must develop a five-year Consolidated Plan that guides funding decisions, project selection and program development over a five year period. The FY2024 – FY2028 Consolidated Plan will cover the period from July 1, 2024 – June 30, 2028.

The consolidated planning process serves as the framework for a community-wide dialogue that fosters a comprehensive, integrated approach to formulate goals and strategies and to identify housing and community development priorities. The Consolidated Plan is guided by three overarching goals which align with the CDBG and HOME program goals and requirements:

1. Providing decent housing by preserving the affordable housing stock, increasing the availability of affordable housing, reducing discriminatory barriers, increasing the supply of supportive housing for those with special needs, and transitioning homeless persons and families into housing;
2. Providing a suitable living environment through safer, more livable neighborhoods, greater integration of LMI residents throughout the city, and increased housing opportunities and reinvestment in deteriorating neighborhoods; and
3. Expanding economic opportunities through the creation/retention of livable-wage jobs, workforce training programs, homeownership opportunities, and development activities that promote long-term community viability and the empowerment of LMI persons to achieve self- sufficiency.

The CDBG and HOME programs provide resources to assist in addressing the priority needs established through the consolidated plan process:

The primary objective of the Community Development Block Grant (CDBG) program is to develop urban communities by providing decent housing, a suitable living environment, and economic opportunities, principally for LMI persons and households. Funds can be used for a variety of activities, including housing rehabilitation and construction, homeownership assistance, lead-based paint (LBP) detection and removal, construction or rehabilitation of public facilities and infrastructure, removal of architectural barriers for persons with disabilities, public services, rehabilitation of commercial or industrial buildings, and loans and grants to businesses.

The HOME Investment Partnership (HOME) program provides funds for the development and rehabilitation of affordable rental and owner-occupied housing for LMI households. HOME funds can be used for activities that promote affordable rental housing and homeownership by LMI households, including rehabilitation and construction, homebuyer assistance, and tenant-based rental assistance.

2. Summarize the objectives and outcomes identified in the Plan

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

The City of Mansfield's Consolidated Plan describes the City's priority community development needs eligible for assistance under the CDBG and HOME Programs, including an assessment of housing, public facilities, infrastructure improvements, public services, accessibility, economic development, and planning needs.

In addition to the primary goals of providing decent housing, a suitable living environment, and expanding economic opportunities, the development of the Consolidated Plan is guided with the requirement of meeting one of the three National Objectives which are the foundation of the HUD programs:

- Benefitting low and moderate income persons;
- Addressing slum and blight; or
- Meeting a particular urgent community development need.

Mansfield's Consolidated Plan describes the priority community development needs eligible for assistance under the CDBG and HOME programs, including an assessment of housing, homelessness, public facilities, infrastructure improvements, public services, accessibility, historic preservation, economic development, and planning needs. The Consolidated Plan includes both long-term and short-term community development objectives that have been developed to address the goals of the CDBG and HOME Programs, while meeting the National Objectives, all to be realized through the execution of the Consolidated Plan.

The City of Mansfield has identified the following goals for the FY 2024 – 2028 Consolidated Plan:

- Improve, Maintain, and Expand Affordable Housing
- Increase Economic Opportunities
- Neighborhood Revitalization
- Provide Needed Public Services
- Homelessness Prevention
- Planning and Program Administration

3. Evaluation of past performance

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

The City of Mansfield has been a direct recipient of CDBG and HOME grant funds since the inception of these programs. As such, the preparation and development of the current Five Year Consolidated Plan and Annual Action Plan represents a logical continuation of the City's past housing assistance and community development programs and builds upon the foundation set forth in prior Consolidated Plans.

At the end of each program year, the City of Mansfield prepares the Consolidated Annual Performance and Evaluation Report (CAPER), which describes the City's progress in meeting its identified needs, priorities and goals as set forth in the Consolidated Plan and Annual Action Plan. Through the monitoring of performance measures, the City is able to identify operational improvements, resource allocation issues, and policy questions to be addressed in future years.

The City of Mansfield continues to strive for success in the implementation of housing assistance and community development programs and services in order to meet the goals established in the Consolidated Plan and ultimately improve the lives of its residents.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

PENDING

5. Summary of public comments

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

PENDING

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

PENDING

7. Summary

The City of Mansfield is expected to receive over \$5.5 million dollars of HUD funding over the next five years to address the housing and community development needs determined through the consolidated plan process. During the development of the Consolidated Plan, a variety of information was researched, reviewed and taken into consideration to assist in determining the priority needs, goals, and geographical priorities. The Needs Assessment and Market Analysis provided a wealth of data and information gleaned from various City and regional documents contributed to a comprehensive review of goals and priorities throughout the City, County and region. Public and stakeholder meetings were held, interviews were taken and surveys were distributed to stakeholders and the general public.

Priorities have been established based on the conclusion of data analysis, public and stakeholder meetings and interviews, completed community and stakeholder surveys and consultations with City staff and elected officials. The City of Mansfield has selected the following priority needs to guide the selection of activities and programs over the FY2024 - 2028 Consolidated Plan period:

1. Housing and Homelessness
2. Public Improvements
3. Neighborhood Facilities
4. Economic Opportunities
5. Public Services
6. West End Neighborhood
7. Mansfield City Corridors
8. Planning

The City of Mansfield will administer and oversee the implementation of activities and programs and the distribution of federal program funds. Over the next five years, the City will work towards an improved and comprehensive revitalization planning Citywide and at the neighborhood level, a greater coordination of programs throughout community providers, and in establishing a Community Housing Development Organization (CHDO). The City will continue to work with local units of government, a variety of housing providers, social service organizations, neighborhoods groups, homeless assistance providers, economic development organizations, housing agencies, and public service providers to remove barriers to affordable housing, assist the homeless population, reduce the number of families experiencing poverty, and other efforts identified in the Strategic Plan.

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

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

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

| Agency Role | Name | Department/Agency |
|--------------------|-------------|----------------------------|
| CDBG Administrator | MANSFIELD | Permitting and Development |
| HOME Administrator | MANSFIELD | Permitting and Development |

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for the development of this Action Plan 2025 is the City of Mansfield's Division of Permitting and Development. The Division of Permitting and Development is also responsible for the administration of the City of Mansfield's CDBG and HOME funds.

Consolidated Plan Public Contact Information

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

1. Introduction

The City of Mansfield carried continual discussions with local partners, agencies, and non profits throughout the year in preparation for the 2025 Action Plan.

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

The City of Mansfield has consulted with many organizations to enhance services and identify need.

The City fosters relationships with other agencies including the local housing authority, apartment complexes and citizens in seeking solutions to fair housing issues within the jurisdiction.

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

The City of Mansfield participates in the Mansfield-Richland County Housing Consortium and Continuum of Care (COC) to coordinate between government, mental health, and other service agencies, the Annual Action Plan reflects the same goals and objectives.

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

The City of Mansfield does not receive ESG funds.

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

Table 2 – Agencies, groups, organizations who participated

| | | |
|---|--|--|
| 1 | Agency/Group/Organization | Mansfield Metropolitan Housing Authority |
| | Agency/Group/Organization Type | PHA |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Mansfield Metropolitan Housing Authority is a continual partner with the City of Mansfield in identifying and creating solutions for housing needs. |
| 2 | Agency/Group/Organization | City of Mansfield |
| | Agency/Group/Organization Type | Other government - Local Grantee Department |
| | What section of the Plan was addressed by Consultation? | Public Housing Needs Homelessness Strategy Market Analysis Economic Development Lead-based Paint Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | The City of Mansfield participates in multiple committees and programs to identify the needs of the community as a whole. Elected officials, and residents are welcome to participate in the planning process. |

| | | |
|---|--|---|
| 3 | Agency/Group/Organization | CATHOLIC CHARITIES |
| | Agency/Group/Organization Type | Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Employment Service-Fair Housing Neighborhood Organization |
| | What section of the Plan was addressed by Consultation? | Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy |
| | Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination? | Catholic Charities is a continual partner is identifying and solving housing needs, food instability, financial education, and fair housing. The City of Mansfield will continue this partnership to address the communities needs. |

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

The 3 listed agencies were the top providers of coordination throughout the 2025 planning process, and identifying needed programs throughout the City of Mansfield as well as looking for solutions. The City of Mansfield regularly coordinates efforts with other local agencies across various topics. Additional agencies include Wayfinders, NECIC, and The Shelter.

Other local/regional/state/federal planning efforts considered when preparing the Plan

| Name of Plan | Lead Organization | How do the goals of your Strategic Plan overlap with the goals of each plan? |
|--|--|--|
| Continuum of Care | Erie County Continuum of Care Region 3 | Continuum of Care goals are reflected in housing and service activities within the Annual Plan. Erie County Continuum of Care is the Region 3 Homeless Crisis Region lead agency. |
| Richland County Housing Needs Assessment | Richland County Regional Planning | https://www.rcrpc.org/housing The data and recommendations in this plan identify affordable housing as a need within the community. Specific data and needs for the City of Mansfield is incorporated into the Assessment. |

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

AP-12 Participation – 91.105, 91.200(c)

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

The City of Mansfield notifies the public in December of the upcoming planning process. Two public meetings are held, one during business hours, and one after hours, in January to inform the public of the processes, eligibility, and timeline of the remainder of the planning process.

A public hearing is scheduled with Mansfield City Council to allow City Council and the public to hear specific application requests for the use of HUD funds.

As of 4/9/2025 no public comments were received for the use of funds, or City Council recommendations.

Public Notice to be filed on or about 4/11/2025 to initiate the 30 Public Comment Period, prior to Action Plan Submission. At this time, the Action Plan reflects allocations based on the percentage of received funds, since actual allocation amounts have not been determined.

Citizen Participation Outreach

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|------------------------------|--|--|--|---------------------|
| 1 | Newspaper Ad | Non-targeted/broad community | Initial ad was a Notice of Funding Availability and Request for Proposals. This notice included information on anticipated funding, website information available, and public meeting information. | No comments were received regarding the NOFA/RFP | | |
| 2 | E-mail | Non-targeted/broad community | E-mail notification was sent to current and prior sub-recipients as well as City Council and elected officials regarding the planning process, timeline, public meetings, and included the NOFA/RFP and instructions on application. | No comments were received regarding the process, on request for additional guidance on the process which was provided. | | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|------------------------------|---|--|--|---------------------|
| 3 | Public Meeting | Non-targeted/broad community | The first public meeting was held on January 8, 2025 @ 5:00PM in the Community Room of the Mansfield Richland County Public Library located at 43 W 3rd St, Downtown Mansfield. One agency was in attendance for that meeting to inquire about use of funds and potential future opportunities. | No comments were received regarding this public meeting or information provided. | | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|------------------------------|---|--|--|---------------------|
| 5 | Public Hearing | Non-targeted/broad community | <p>The City of Mansfield held a public hearing during Mansfield City Council on February 18, 2025. Mansfield City Council also provided notice of the hearing via e-mail and newspaper publication to all media outlets, council, and various other community recipients. The hearing was well attended by all except one applicant for 2025 funds. Each applicant gave a summary of the services they intend to provide, and City Council and the general public were invited to ask questions or comment on the specific program.</p> | No comments were received during this hearing. | | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|--|------------------------------|---|--|--|---------------------|
| 6 | Public Affairs Committee/ City Council | Non-targeted/broad community | The Public Affairs Committee held a meeting directly before City Council Caucus to discuss recommendations for the use of 2025 CDBG/HOME funds. Programs were all discussed. | No comments were received as part of this process. | | |
| 7 | City Council- Vote | Non-targeted/broad community | The City of Mansfield scheduled a vote for the use of 2025 CDBG/HOME funds which was made public via e-mail to all media outlets and various other recipients of Council notices. The schedule of proposed legislation was published on the City's website. | There were questions from City Council members regarding modifying program recommendations, that were ultimately decided against by City Council. No additional comments received. | | |

| Sort Order | Mode of Outreach | Target of Outreach | Summary of response/attendance | Summary of comments received | Summary of comments not accepted and reasons | URL (If applicable) |
|------------|------------------|------------------------------|--|------------------------------|--|---------------------|
| 8 | Newspaper Ad | Non-targeted/broad community | On April 11, 2025 a notification regarding the minimum 30 comment period regarding the use of 2025 CDBG/HOME funds was published in the local news outlets. A draft of the Action Plan was made available online, and in person. | | | |

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

AS OF APRIL 9, 2025 HUD HAS NOT ALLOCATED ACTUAL GRANT AMOUNTS TO AGENCIES. ALL ALLOCATION AMOUNTS ARE ESTIMATED UNTIL FINAL NUMBERS ARE PROVIDED. ACTION PLAN WILL BE UPDATED TO INCLUDE ACTUAL AMOUNTS AS SOON AS THEY ARE RECEIVED, AND NOTICE WILL BE PROVIDED TO MEDIA AND CITY COUNCIL AT THAT TIME.

Anticipated Resources

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|--|----------------------------------|--------------------|--------------------------|--------------|---|--|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| CDBG | public - federal | Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services | 740,000.00 | 133,106.94 | 1,051,428.01 | 1,924,534.95 | 2,220,000.00 | PI \$27,246.51 RLF 105,680.43FINAL ALLOCATION NUMBERS FOR 2025 NOT YET PROVIDED BY HUD |

| Program | Source of Funds | Uses of Funds | Expected Amount Available Year 1 | | | | Expected Amount Available Remainder of ConPlan \$ | Narrative Description |
|---------|------------------|---|----------------------------------|--------------------|--------------------------|--------------|---|---|
| | | | Annual Allocation: \$ | Program Income: \$ | Prior Year Resources: \$ | Total: \$ | | |
| HOME | public - federal | Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA | 340,000.00 | 0.00 | 974,382.66 | 1,314,382.66 | 1,000,000.00 | FINAL ALLOCATION NUMBERS FOR 2025 NOT YET PROVIDED BY HUD |

Table 5 - Expected Resources – Priority Table

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

The City will need to continue find ways to better leverage scarce resources to support affordable and decent housing at the scale necessary to make real gains on the housing challenges. This includes working with local partners to develop capacity, and also seeking resources and development capacity beyond the City to include Low Income Housing Tax Credit and the newly established Single Family Tax Credit Program through OHFA (Ohio Housing Finance Agency). The City will need to support the development of local partner capacity, including the creation of at least one local CHDO. In addition, the City needs to attract outside developers by creating RFPs with targeted goals and the putting up of funds to be leveraged by significant dollars from outside the City to develop housing at a larger scale.

The Richland County Land Reutilization Corporation is being leveraged as a tool for economic development. North Central State College, which shares the campus of The Ohio State University, provides on-demand, customized training through their Workforce and Community Development Division. NCSC's Kehoe Center is a regional training center located in Shelby, Ohio. The Center provides advanced manufacturing integrated skills training, including tool and die technology, computer numerical control (CNC) technology, information technology, and more. These potential funding collaborations provide opportunity for increased educational attainment, job skills training, and workforce development.

The Richland County Foundation has an expressed interest in funding development projects, having pledged one million dollars to the Imagination District along Park Ave West, bordering LMI census tracts 5, 6 and 31. Additionally, the Foundation funds many needed public services and activities each year within the community and represents a large stakeholder for the area. The same census tracts are designated as federal Opportunity Zones. Through tax incentives, investors are encouraged to reinvest their unrealized capital gains into the Opportunity Zones of distressed communities.

The Mansfield Housing Needs Assessment suggests the larger Landbank owned properties could be leveraged to support non-competitive tax credit development. The leverage of funding potentials identified throughout the planning documents provides impactful opportunities for CDBG and HOME contributions.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Mansfield, along with the Richland County Land Reutilization Corporation (Land Bank) through its activities owns and maintains several tracts of vacant land. The City, in partnership with the Land Bank, will continue to identify strategies for vacant properties and properties that have a high probability of becoming vacant. The goal is to identify areas where the City or Land Bank can assemble properties to create developable sites and market them for residential and/or economic development, as well as look at existing structures for rehabilitation.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|--|------------|----------|-----------------------------------|-----------------------|---|---------|--|
| 1 | Improve, Maintain, and Expand Affordable Housing | 2024 | 2028 | Affordable Housing Homeless | City-Wide | Housing and Homelessness | | Rental units constructed: 2 Household Housing Unit Direct Financial Assistance to Homebuyers: 3 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted |
| 2 | Increase Economic Opportunities | 2024 | 2028 | Non-Housing Community Development | City-Wide | Economic Opportunities | | Jobs created/retained: 10 Jobs Businesses assisted: 1 Businesses Assisted |
| 3 | Neighborhood Revitalization | 2024 | 2028 | Non-Housing Community Development | West End Neighborhood | Public Improvements West End Neighborhood | | Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 500 Households Assisted Housing Code Enforcement/Foreclosed Property Care: 50 Household Housing Unit |

| Sort Order | Goal Name | Start Year | End Year | Category | Geographic Area | Needs Addressed | Funding | Goal Outcome Indicator |
|------------|-------------------------------------|------------|----------|---|---|-----------------------------|---------|--|
| 4 | Provide Needed Public Services | 2024 | 2028 | Non-Homeless Special Needs Non-Housing Community Development | CDBG Eligible Census Tracts City-Wide | Public Services | | Other: 400 Other |
| 5 | Homelessness Prevention | 2024 | 2028 | Affordable Housing Homeless | City-Wide | Housing and Homelessness | | Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted |
| 6 | Planning and Program Administration | 2024 | 2028 | Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development | City-Wide | Planning | | Other: 1 Other |

Table 6 – Goals Summary

Goal Descriptions

| | | |
|---|-------------------------|---|
| 1 | Goal Name | Improve, Maintain, and Expand Affordable Housing |
| | Goal Description | The City will administer several programs in an effort to improve access, condition, and to increase choices of affordable housing. These activities may include acquisition and disposition, relocation, emergency home repairs, full home rehabilitation, and new construction to address safety and health issues and/or ensure properties are brought up to local building code and property maintenance standards including the removal of blight, historic preservation, fair housing, and financial assistance to improve housing conditions. Provision of housing for the homeless, housing for special populations, new rental development, rental rehabilitation, housing accessibility, improved energy efficiency, rental assistance and other related eligible activities. |
| 2 | Goal Name | Increase Economic Opportunities |
| | Goal Description | The City's goal in utilizing any eligible economic development activity option for expanding economic opportunities include public infrastructure improvements to attract and retain employers, young professionals and other talent, provide programs to improve the accessibility of skilled labor training that will benefit unemployed or underemployed LMI adults, and a revolving loan fund program. Planning and development activities will include review and updates to local zoning and building codes to support land reuse and economic development benefiting low and moderate income residents. |
| 3 | Goal Name | Neighborhood Revitalization |
| | Goal Description | Funds will be used to foster healthy, stable, and attractive neighborhoods, access to quality public facilities, and blight removal by funding neighborhood revitalization activities such as senior centers, youth centers, childcare centers, community centers, parks and recreation facilities, libraries, education centers, centers for those with disabilities, neglected/abused children centers, healthcare facilities, parking facilities, solid waste disposal improvements, water/sewer improvements, flood drain improvements, street improvements, sidewalks, tree planting and streetscaping. |
| 4 | Goal Name | Provide Needed Public Services |
| | Goal Description | No more than 15% of CDBG funds will be used to assist residents with a broad spectrum of public service activities to improve their quality of life and enhance their living environment. Provision of public services include crime prevention, child care, mental health services, health services, youth services, domestic violence services, substance abuse services, services for the elderly and educational services. The public service will be either a new service or a quantifiable increase in the level of an existing service. |

| | | |
|---|-------------------------|---|
| 5 | Goal Name | Homelessness Prevention |
| | Goal Description | Activities regarding homelessness may include but are not limited to outreach, emergency shelter and transitional housing, permanent supportive housing, rapid re-housing, and prevention activities. |
| 6 | Goal Name | Planning and Program Administration |
| | Goal Description | Planning activities include in-house planning at the Community Development Office, work with other departments, individual consultants or consultant entities to work on projects, conduct studies, develop plans, and execute reports for neighborhoods to best assist the City with the execution of projects and neighborhood improvements. The City of Mansfield will execute general planning and overall management of HUD-funded activities to be undertaken during the 5-Year Consolidated Plan Period, including affirmatively furthering fair housing in the community. |

Projects

AP-35 Projects – 91.220(d)

Introduction

AS OF APRIL 9, 2025 ACTUAL ALLOCATION AMOUNTS HAVE NOT BEEN ANNOUNCED BY HUD. EACH IDENTIFIED PROJECT WILL HAVE A PERCENTAGE OF THE GRANT AMOUNT RECEIVED ASSOCIATED IN THE NARRATIVE, UNTIL SUCH TIME ACTUAL AWARD AMOUNTS CAN BE DETERMINED BASED OFF THE APPROVED PERCENTAGES.

The City will use CDBG and HOME funds to carry out the selected projects as provided for through HUD's FY25 allocation. During the implementation of the projects, the following financial requirements will be met:

- No more than 20% of CDBG funds will be expended on Planning and Administration.
- No more than 15% of CDBG funds will be expended on public service activities.
- No less than 70% of the aggregate expenditures of CDBG funds will benefit low and moderate- income persons.
- No more than 10% of HOME funds will be expended on Planning and Administration.
- No less than 15% of HOME funds will be expended on CHDO activities, once a CHDO has been established.

Projects

| # | Project Name |
|----|--------------------------------|
| 1 | CDBG Administration |
| 2 | Targeted Code Enforcement |
| 3 | Emergency Repair |
| 4 | West End Target Area |
| 5 | Economic Development RLF |
| 6 | Public Services |
| 7 | HOME Administration |
| 8 | CHDO Set-Aside |
| 9 | Homeowner Rehabilitation |
| 10 | Tenant Based Rental Assistance |
| 11 | Down Payment Assistance |
| 12 | Homebuyer Development |
| 13 | Rental Development |

Table 7 - Project Information

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

Allocation priorities are based on the City's housing and community development needs assessment and market analysis data provided for the Consolidated Plan, feedback from residents and community stakeholders, funding applications received through a competitive applications cycle and City leadership.

The obstacles to addressing underserved needs include the limited amount of funds available as compared to the needs of the City and the lack of a designated CHDO.

AP-38 Project Summary
Project Summary Information

| | | |
|----------|--|--|
| 1 | Project Name | CDBG Administration |
| | Target Area | City-Wide |
| | Goals Supported | Planning and Program Administration |
| | Needs Addressed | Planning |
| | Funding | : |
| | Description | Planning and administration expenses related to the implementation of the CDBG program.20% of Grant |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | This funding will be allocated for program administration. |
| | Location Description | Program Administration will cover all projects and activities City Wide |
| | Planned Activities | Planning and Administrative oversight, along with Fair Housing |
| 2 | Project Name | Targeted Code Enforcement |
| | Target Area | CDBG Eligible Census Tracts West End Neighborhood |
| | Goals Supported | Neighborhood Revitalization |
| | Needs Addressed | West End Neighborhood |
| | Funding | : |
| | Description | Funding contribution for one inspector assigned to Census Tract 5 to provide concentrated enforcement as part of the neighborhood improvements.Code Enforcement 2.03% of grant |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | This activity will serve census tract 5, which is a qualifying census tract with a population of approximately 3,200. |
| | Location Description | Taregeted Code enforcement will be provided for all of Census Tract 5. |
| | Planned Activities | Targeted Code Enforcement |
| 3 | Project Name | Emergency Repair |
| | Target Area | City-Wide |
| | Goals Supported | Improve, Maintain, and Expand Affordable Housing |

| | | |
|---|--|--|
| | Needs Addressed | Housing and Homelessness |
| | Funding | : |
| | Description | The Emergency Repair Program assists low to moderate income homeowners to correct housing conditions, which if neglected, would adversely affect the health, safety, and welfare of the homeowner.8.92% of Grant, plus \$172,110.64 of prior year/Program Income |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield Anticipates assisting approximately 12 households with emergency repair assistance. |
| | Location Description | Households assisted can be City Wide providing they meet income qualification guidelines |
| | Planned Activities | The City of Mansfield will assist eligible homeowners with emergency repairs, such as Roofs, furnaces, water heaters, and other priority repairs. |
| 4 | Project Name | West End Target Area |
| | Target Area | West End Neighborhood |
| | Goals Supported | Neighborhood Revitalization |
| | Needs Addressed | West End Neighborhood |
| | Funding | : |
| | Description | West End Target Area development through infrastructure and public facility improvements.54.05% of grant, plus \$906,743.88 prior allocation |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield anticipates the majority of Census Tract 5 will benefit from infrastructure improvements along Glessner Ave, making the area more pedestrian friendly and safe. |
| | Location Description | The West End Neighborhood is within Census Tract 5, a qualifying census tract in the City of Mansfield. The primary location is along Glessner Avenue, which is a main corridor for the neighborhood. |

| | | |
|---|--|--|
| | Planned Activities | The City of Mansfield will continue infrastructure improvements to upgrade sidewalks, street lighting, improve accessibility, and include tree lawns for beautification and safety. |
| 5 | Project Name | Economic Development RLF |
| | Target Area | City-Wide |
| | Goals Supported | Increase Economic Opportunities |
| | Needs Addressed | Economic Opportunities |
| | Funding | : |
| | Description | Assistance to businesses to increase economic opportunity and retain jobs. All RLF funds Estimated \$105,680.43 |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield will utilize ongoing Revolving Loan Funds to provide financial assistance to businesses on a Low/Moderate Job basis. |
| | Location Description | The City of Mansfield will make Revolving Loan Funds available to businesses City Wide. |
| | Planned Activities | The City of Mansfield will provide loan funds to eligible businesses within the City of Mansfield |
| 6 | Project Name | Public Services |
| | Target Area | City-Wide |
| | Goals Supported | Provide Needed Public Services |
| | Needs Addressed | Public Services |
| | Funding | : |
| | Description | Provide Needed Public Services |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield Estimates up to 500 individuals/ households will be assisted with provided Public Services funding to various organizations within the City of Mansfield. |
| | Location Description | The City of Mansfield will provide Public Services funding to various organizations which serve the LMI population within the City of Mansfield. Anticipated programs include door-to-door transit, summer programs, childcare assistance, and food banks. |

| | | |
|----------|--|---|
| | Planned Activities | The City of Mansfield will provide funding to organizations providing needed public services within the City of Mansfield. |
| 7 | Project Name | HOME Administration |
| | Target Area | City-Wide |
| | Goals Supported | Planning and Program Administration |
| | Needs Addressed | Planning |
| | Funding | : |
| | Description | Planning and Administration expenses related to the implementation of the HOME program. |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | This funding is for Planning and Program Administration. |
| | Location Description | This funding is for Planning and Program administration serving City Wide |
| | Planned Activities | This project will support planning and program administration. |
| 8 | Project Name | CHDO Set-Aside |
| | Target Area | City-Wide |
| | Goals Supported | Improve, Maintain, and Expand Affordable Housing |
| | Needs Addressed | Housing and Homelessness |
| | Funding | : |
| | Description | HOME funds provided to Community Housing Development Organizations to meet the 15% CHDO set aside requirement. |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield does not have a designated CHDO at this time. The City of Mansfield will continue to work towards identifying a qualified CHDO to carry out housing activities within the City of Mansfield. It is anticipated that all available funding could serve 2-3 qualified households. |
| | Location Description | The City of Mansfield will make CHDO funds available for City Wide activities within the City of Mansfield. |

| | | |
|-----------|--|---|
| | Planned Activities | The City of Mansfield will continue to work to identify a qualified CHDO to carry out housing activities within the City of Mansfield. |
| 9 | Project Name | Homeowner Rehabilitation |
| | Target Area | City-Wide |
| | Goals Supported | Improve, Maintain, and Expand Affordable Housing |
| | Needs Addressed | Housing and Homelessness |
| | Funding | : |
| | Description | The Homeowner Rehabilitation Program assists low to moderate income homeowners with comprehensive rehabilitation efforts. |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield estimates one household can be assisted with Homeowner Rehabilitation funds City Wide. |
| | Location Description | Homeowner Rehabilitation funds will be available to qualifying residents City-Wide. |
| | Planned Activities | The City will utilize these funds to fully rehabilitate one home within Mansfield City Limits to a qualifying homeowner. |
| 10 | Project Name | Tenant Based Rental Assistance |
| | Target Area | City-Wide |
| | Goals Supported | Improve, Maintain, and Expand Affordable Housing Homelessness Prevention |
| | Needs Addressed | Housing and Homelessness |
| | Funding | : |
| | Description | Financial assistance to LMI households at risk of homelessness due to the inability to pay rental housing expenses. The Shelter \$142,791.01Additional undetermined recipient \$100,000 |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield anticipates up to 12 individuals and families being assisted with Tenant Based Rental Assistance Funding. |
| | Location Description | The Tenant Based Rental Assistance Program will be available City-Wide to qualifying applicants. |

| | | |
|-----------|--|--|
| | Planned Activities | Tenant Based rental assistance will be made available through "The Shelter:" for qualifying clients to obtain safe, affordable housing within the City of Mansfield. |
| 11 | Project Name | Down Payment Assistance |
| | Target Area | City-Wide |
| | Goals Supported | Improve, Maintain, and Expand Affordable Housing |
| | Needs Addressed | Housing and Homelessness |
| | Funding | : |
| | Description | Assistance to LMI homebuyers for home ownership.Recommended \$62,500 undetermined recipient |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield estimates it can assist up to 10 households with Down Payment Assistance. |
| | Location Description | The City of Mansfield will make Down-Payment Assistance funds available City Wide. |
| | Planned Activities | The City of Mansfield will make Down Payment Assistance funds available City Wide to qualifying First-Time Homebuyers. |
| 12 | Project Name | Homebuyer Development |
| | Target Area | City-Wide |
| | Goals Supported | Improve, Maintain, and Expand Affordable Housing |
| | Needs Addressed | Housing and Homelessness |
| | Funding | : |
| | Description | Funding provided to assist in the development of affordable homeowner housing.Estimated \$127,645.29 |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield anticipates funding to create 1 affordable housing unit. |

| | | |
|-----------|--|--|
| | Location Description | The City of Mansfield will make funds available City Wide to an eligible project. |
| | Planned Activities | Funding will be made available for an eligible project within the City of Mansfield. |
| 13 | Project Name | Rental Development |
| | Target Area | City-Wide |
| | Goals Supported | Improve, Maintain, and Expand Affordable Housing |
| | Needs Addressed | Housing and Homelessness |
| | Funding | : |
| | Description | Funding provided to assist in the development of affordable rental housing. Estimated \$400,000 |
| | Target Date | 6/30/2026 |
| | Estimate the number and type of families that will benefit from the proposed activities | The City of Mansfield anticipates creating up to 6 affordable rental units with Rental Assistance funding. |
| | Location Description | The City of Mansfield will make funding available to projects City Wide. |
| | Planned Activities | Assist in the development of affordable rental units within the City of Mansfield. |

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City has a 60% low-to-moderate income population, qualifying the City as LMI. The need for citywide efforts is evident in the survey results received, public meetings held and stakeholder interviews conducted. There are 21,555 housing units in the City. Of these units, 49.8% are rental units and 50.2% are homeowner units. The housing stock is a concern with 87% of owner-occupied housing and 75% of renter occupied housing being built prior to 1980. Much of the housing stock is in need of rehabilitation and some are in need of demolition. There is a 12% vacancy rate of housing units.

Geographic Distribution

| Target Area | Percentage of Funds |
|-----------------------------|----------------------------|
| CDBG Eligible Census Tracts | |
| Mansfield City Corridors | 33 |
| City-Wide | |
| West End Neighborhood | 67 |

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

During the development of the Consolidated Plan, a variety of information was researched, reviewed and taken into consideration to assist in determining the priority needs, goals, and geographical priorities. The Needs Assessment and Market Analysis provided a wealth of data and information gleaned from various City and regional documents contributed to a comprehensive review of goals and priorities throughout the City, County and region. Public and stakeholder meetings were held, interviews were taken and surveys were distributed to stakeholders and the general public.

Discussion

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Mansfield will provide emergency repair, targeted code enforcement, homeowner rehabilitation, tenant based rental assistance, homebuyer development and rental development with the FY25 funding to eligible families within the City limits. These programs are described in detail under Section AP-35 "Projects".

| One Year Goals for the Number of Households to be Supported | |
|---|-----|
| Homeless | 0 |
| Non-Homeless | 150 |
| Special-Needs | 0 |
| Total | 150 |

Table 9 - One Year Goals for Affordable Housing by Support Requirement

| One Year Goals for the Number of Households Supported Through | |
|---|----|
| Rental Assistance | 35 |
| The Production of New Units | 10 |
| Rehab of Existing Units | 15 |
| Acquisition of Existing Units | 0 |
| Total | 60 |

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The City of Mansfield will provide emergency and full home rehabilitations with the allocated monies from this year's plan to eligible families within the City limits. The HOME program will provide incentives to developers for the production of units for LMI populations for Homebuyer and Rental activities.

AP-60 Public Housing – 91.220(h)

Introduction

PENDING UPDATES MANSFIELD METROPOLITAN HOUSING STATS

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

There are no public housing units in the City of Mansfield.

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

There are no public housing residents. The Mansfield Metropolitan Housing Authority does utilize a Resident Advisory Board from residents receiving housing choice vouchers that meets periodically throughout the year. They are granted an opportunity to comment on the Five Year and Annual Plans submitted by the Mansfield Metropolitan Housing Authority to the Department of Housing and Urban Development.

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

The Mansfield Metropolitan Housing Authority is not designated as a troubled agency.

Discussion

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

Introduction

The Continuum of Care is a partnership of the City, County and nonprofit agencies purposed to end chronic homelessness, provides oversight for service agencies and shelters, and coordinates efforts to reduce duplication of homeless services. They are an independent body that promotes solution-oriented planning and coordination of services, development of performance based strategic planning and evaluation, and development of service partnerships to increase linkages.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

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

The Continuum of Care has been managing many of the region’s homeless related activities and programs. Through First Call 211 at the Richland County Library and Catholic Charities, there is a broad effort to bring numerous agencies together to increase the effectiveness of the group, including regular monthly meetings. Richland County 211 provides an intake process and performs the initial centralized screening to determine primary and urgent needs.

The City has a “Homeless Response Team” where officers team up with mental health professionals weekly to do outreach in the streets to help ensure those experiencing homelessness are connected to appropriate resources. Richland Public Health provides various medical services and administers the WIC program. The Richland County Mental Health and Recovery Services Board, through its affiliates, provides a number of alcohol, drug addiction, mental health and related services.

Addressing the emergency shelter and transitional housing needs of homeless persons

The four agencies providing housing for the homeless population in the City of Mansfield are the Catholic Charities Diocese of Toledo, the Mansfield Metropolitan Housing Authority, the Domestic Violence Shelter, and Wayfinders Ohio, Inc. There is a shortage of temporary housing options in the City, in particular transitional housing for adults without children. The Homeless Needs Inventory and Gap Analysis Table found in MA-30 indicates 9 additional beds are needed to meet current demand. There is a need for additional permanent supportive housing units for both families and single adults. The same Homeless Needs Inventory and Gap Analysis Table shows a need for 7 additional family beds (3 units), and 49 additional adult only beds (41 units). Wayfinders Ohio is currently under renovations for a new location to increase capacity for emergency shelter.

The Mansfield City Schools have been a partner in identifying children that are homeless through the Safe Program and are members of the Continuum of Care. Agencies partner with one another to address

housing needs and provide other services to these households. The goal is to break the cycle. Case managers try to help the individuals develop a goal plan and get them connected with whatever services they need. If they need employment, they do a weekly job readiness training. They also do life-skills training and have a program that can help pay their first month's rent and deposit if they qualify. A lack of sufficient decent, safe, affordable housing in the community contributes to the pipeline of homelessness, with many housing cost burdened households in the community.

In 2021, the American Rescue Plan was signed into law for the HOME Investment Partnerships Program (HOME) to address the need for homelessness assistance and supportive services. Congress appropriated \$5 billion in ARP funds to be administered through the HOME program for activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or other vulnerable populations. The City of Mansfield will be utilizing over \$1 million dollars of HOME-ARP funding to assist in the goal of developing additional permanent supportive housing. Quite simply, the first priority is housing and the second priority is services and case management. Twelve units of permanent supportive housing units are estimated to be built with HOME-ARP funds being used as 'gap' funding not to exceed 20% of the total project cost. HOME-ARP funds will also be used to fund supportive services to approximately 120 people as well as provide operating and capacity building funds to support the non-profit organizations who are working with individuals and families who are homeless, at risk of homelessness, or other vulnerable populations.

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

Homeless persons and those at risk of homelessness have a number of services available to them in the effort to obtain and sustain permanent housing. Richland Public Health provides various medical services and administers the WIC program. The Richland County Mental Health and Recovery Services Board, through its affiliates, provides a number of alcohol, drug addiction, mental health and related services. Richland County 211 provides an intake process and performs the initial centralized screening to determine primary and urgent needs. Emergency shelter services and transitional housing are provided, as available, to homeless persons with the goal of re-housing.

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

employment, education, or youth needs.

There are a number of services to assist persons returning from mental and physical health institutions, and to ensure they receive appropriate housing. The Richland County Mental Health and Recovery Services Board provides through its affiliates a number of alcohol, drug addiction, mental health and related services, such as vocational rehab; crisis intervention, including a hotline; peer support services; programs for adolescents and youth; suicide prevention education; programs for Deaf and Hard-of- Hearing; programs for ex-offenders; behavioral health assessments; counseling for trauma, sexual abuse, addiction, depression and anxiety; and physical, occupational, and speech therapy.

Additionally, the following providers and services are targeted to individuals to meet their supportive housing needs:

- Abraxas Ohio, located in Shelby, Ohio provides residential treatment services to adolescent males and outpatient treatment services to adolescents and adults. Services are provided to address conditions such as substance use and mental health disorders, family dysfunction, trauma and abuse histories.
- Catalyst Life Services offers mental health and crisis services including a 24 hour stabilization unit and helpline. Catalyst also provides addiction, vocational, audiology and deaf services. Services include peer support, case management, crisis intervention, medical care, and a variety of programs and treatments for both adults and children. Housing for those in residential treatment programs is also included.
- Richland County Community Alternative Center is an OhioMHAS certified drug and alcohol treatment program that provides concurrent intensive counseling services within safe and secure housing for adult men and women. It provides an alternative to jail for adult offenders.
- Foundations for Living is a secure Residential Treatment Facility for males and females ages 11 to 18 offering treatment for mental health, addiction, survivors of human trafficking, pregnant teens, and self-injurious behavior.

It is also noted that during the Consolidated Planning process, agencies identified a need for housing opportunities for ex-offenders returning back to the community. This again highlights the importance of affordable housing options tied to available services.

Discussion

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

Introduction:

The City does not have a comprehensive plan, though they do have other plans that cover portions of what a comprehensive plan would cover. The City does intend on the creation of a Comprehensive Plan. There is, however, an economic development plan, a plan for the local university, a downtown plan called Mansfield Rising, and a plan that covers the North end of the City. This North end plan does cover housing, and more specifically, housing needs and affordability. The City has also been in discussions with the local hospital regarding plans for the West End. In addition, the County has a comprehensive plan, and the plan has a section on housing, but it does not address housing affordability. The County also recently completed a housing assessment that includes the City of Mansfield. There is a need for improved and comprehensive revitalization planning Citywide at the neighborhood level, with unique and appropriate strategies for each neighborhood type. These plans should include not only housing, but parks, safety, blight removal, infrastructure, amenities – a comprehensive approach to addressing neighborhood needs. The City should set housing goals and develop implementation strategies for both subsidized housing and private investment. The City has a facilitation role in housing and needs to support rather than seek to supplant private development.

The City lacks a Community Housing Development Organization, or CHDO, which leaves federal funding unused, and notes a need for the further development of local housing capacity. Making technical assistance available to local agencies with potential to support housing goals can also assist them in building local capacity.

Due to the current lack of large development housing expertise in the community, technical assistance is needed to develop an appropriate RFP to attract State level developers to the community, while at the same time ensuring a degree of local control over the final product. There are also opportunities to pair these large developers with local agencies to build local capacity.

The Richland County Housing Needs Assessment and Action Plan identifies a substantial gap of developers and contractors, especially those who are certified to work on HOME and other HUD-funded projects and identifies improvements to public transportation as a barrier to housing due to the limitations of the service areas and hours of service. Stakeholders especially noted that the lack of late-night transit service complicates those seeking 2nd shift (can't get home) and 3rd shift (can't get to work). The Richland County Housing Needs Assessment and Action Plan noted opportunities for additional collaboration among several agencies to streamline service delivery of various rental subsidy

and utility assistance programs.

The zoning for the City has a mix of uses, including a number of areas that allow for multifamily housing. There are not unreasonable required building sizes in the zoning code. There are no locally levied impact fees attached to new developments. City building codes follow standards and practices established by the State of Ohio, which is largely modeled after national codes. There is no rehabilitation code and manufactured housing requirements are regulated by State and Federal requirements. The permit application process could be further streamlined. Alignment of codes and permitting across the Richland County housing market is another area identified in the housing assessment that could help to attract both developers and contractors and facilitate additional needed housing development.

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

The Community Development Office will continue to work closely with housing and community development providers to implement the Consolidated Plan and most effectively meet the housing needs within the community. In addition to representing the City at area meetings, the Community Development Office will look to:

1. Be the catalyst for an improved and comprehensive revitalization planning Citywide at the neighborhood level with unique and appropriate strategies for each neighborhood type.
2. The City will look to set housing goals and develop implementation strategies for both subsidized housing and private investment. The City will have a facilitation role in housing and will support rather than seek to supplant private development.
3. The City will actively seek to find or develop a Community Housing Development Organization (CHDO). For local agencies who support the City's housing goals and are interested in becoming a CHDO, the City will make technical assistance available to assist the organization in building capacity.
4. Develop and implement an outreach plan to attract developers and contractors who are certified to work on HOME and other HUD-funded projects. For interested contractors and developers who lack the expertise, the City will make technical assistance available to build capacity for such contractors and developers.

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

The City plans to undertake the following actions to address the City's housing and community development needs and reach the goals established in the 2024-2028 Consolidated Plan.

Actions planned to address obstacles to meeting underserved needs

The City will work towards an improved and comprehensive revitalization planning Citywide and at the neighborhood level, a greater coordination of programs throughout community providers, and in establishing a Community Housing Development Organization (CHDO). The City will continue to work with local units of government, a variety of housing providers, social service organizations, neighborhoods groups, homeless assistance providers, economic development organizations, housing agencies, and public service providers to remove barriers to affordable housing, assist the homeless population, reduce the number of families experiencing poverty, and other efforts identified in the Strategic Plan.

Actions planned to foster and maintain affordable housing

The City of Mansfield will provide emergency repair, targeted code enforcement, homeowner rehabilitation, tenant based rental assistance, homebuyer development and rental development with FY25 funding to eligible families within the City limits. Detailed information about these activities and one year goals can be found within the AP-55 Section of the Action Plan.

Actions planned to reduce lead-based paint hazards

The City of Mansfield has established guidelines for dealing with lead-based paint hazards in homes being rehabilitated under its HUD-funded programs. A Lead Risk Assessment is undertaken early in the process once rehab specifications have been drafted by City inspectors. All rehab contractors working on projects involving surfaces that contain lead must be certified as Lead Safe Renovators in order to participate in the City's housing rehabilitation and repair/maintenance programs. The City provides literature about lead based paint to all applicants to the program and the general population on the City web site and the information desk in the entrance to the local residents, homeowners, and agencies. It is required by the Mansfield Board of Realtors to disseminate information regarding the proper disclosure of lead hazards upon selling or renting a housing unit for lead paint hazards. Through home rehabilitation, home repair, and even demolition, the affected housing is being renovated or removed. The City has outlined a more detailed strategy in SP-65 of the Strategic Plan.

Actions planned to reduce the number of poverty-level families

The City has allocated RLF Income funds to continue an Economic Development Revolving Loan Fund

(RLF) Program to help meet the goal of reducing the number of poverty-level families. There is a collective regional effort to bring residents out of poverty. Housing cost burden is a significant problem in the City of Mansfield. Housing affordability will be addressed with a two-prong approach, consisting of figuring out ways to make housing for both owners and renters less expensive, and by developing strategies to increase incomes of households within the City. Greater economic opportunities will help to provide more choices to LMI residents about the housing and neighborhood in which they live. The City has outlined a more detailed strategy in SP-70 of the Strategic Plan.

Actions planned to develop institutional structure

The City will continue to work closely with local human service, housing, and community development providers to implement the Consolidated Plan to most effectively meet the needs within the community with the limited federal, city, non-profit, and for-profit resources available. In addition to representing the City at area meetings, the Community Development Office continues to work with local neighborhood organizations and reinforces collaboration between government agencies and local service and housing providers. The City will dedicate CDBG and HOME funding to a wide variety of housing and service related activities and be intentional about targeting the funds and projects for the greatest impact and leverage opportunities. Since there are local organizations geared to provide housing and supportive services, it will be imperative to form partnerships on these initiatives from both a collaborative and financial perspective. Forming and fostering these additional partnerships going forward is one way that the City plans to address this gap as further detailed in SP-40 of the Strategic Plan.

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

The City will continue to partner with the Continuum of Care (CoC), County and nonprofit agencies purposed to end chronic homelessness, provide oversight for service agencies and shelters, and coordinate efforts to reduce duplication of homeless services. The CoC is an independent body that promotes solution-oriented planning and coordination of services, development of performance based strategic planning and evaluation, and development of service partnerships to increase linkages. Additional information on the Continuum of Care and the strategies for enhanced coordination can be found in SP-40 and SP-60 of the Strategic Plan.

Discussion:

Program Specific Requirements

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

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

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

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

Other CDBG Requirements

| | |
|---|-------|
| 1. The amount of urgent need activities | 0 |
| 2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan. | 0.00% |

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

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

The City continues to work with local agencies to develop a CHDO which can provide additional investment in the City.

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

The City of Mansfield's Recapture / Resale Policy is provided as an attachment to the Plan.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Mansfield's Recapture / Resale Policy is provided as an attachment to the Plan.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

N/A

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

The City of Mansfield will be funding a TBRA program for use by our local Domestic Violence Shelter.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

N/A

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that

limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

N/A

Attachments

The City of Mansfield, Ohio



May 2024

Prepared for the City of Mansfield by



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Executive Summary

The HUD Fair Housing and Equal Opportunity (FHEO) Office advises federal entitlement communities and participating jurisdictions to complete an Analysis of Impediments (AI) to Fair Housing Choice as a complimentary document to their five-year Consolidated Plan. In addition, as part of the Consolidated Plan, grantees are required to submit an AFFH (Affirmatively Furthering Fair Housing) certification which requires them to undertake Fair Housing Planning through: The completion of an AI; actions to eliminate any certified impediments; and maintenance of AFFH records.

Overview of Process

As recipients of the Community Development Block Grant (CDBG) and the HOME Investment Partnerships (HOME) Program, the City of Mansfield certifies that they will conform with the Fair Housing Act, will regularly conduct an analysis of impediments to fair housing choice, will take appropriate actions to eliminate identified impediments to fair housing choice, will take actions to affirmatively further fair housing, and will maintain records documenting the analysis and progress towards affirmatively furthering fair housing choice.

The Department of Housing and Urban Development (HUD) defines impediments to fair housing as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choice; or
- Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choice on the basis of race, color, religion, sex, disability, familial status, or national origin.

The City of Mansfield, in compliance with this requirement, has produced this analysis of impediments. To understand the challenges around fair housing, and the limitations to housing choice for these population groups, we have conducted a considerable qualitative and quantitative analysis.

The qualitative analysis consisted of a full public participation process, including public and stakeholder surveys; a virtual public and stakeholder meeting including polling and discussion; an in-person public and stakeholder meeting with a facilitated process for selecting priorities; interviews with stakeholders, a public comment period, and a public hearing. Through this process we gleaned a lot of useful information to guide this report.

On the quantitative side, we analyzed data from a variety of sources, seeking to understand regulatory, policy, and practices relevant to this topic, and to understand the community dynamics, availability of housing, access to opportunity, enforcement, education, and resources around fair housing.

Armed with all of this information, we then sought to understand the depth of the fair housing challenge, and the impediments to fair housing choice for vulnerable populations. These impediments are summarized below.

Summary of Findings

We identified six primary impediments to fair housing choice, which are described below. In chapter 9 of this document, we also outline a plan for addressing each of these impediments over the course of the next five years. The five impediments that we identified are as follows:

There is a shortage of decent rental housing choices across the City. Much of the rental housing stock, particularly the affordable housing stock is old and in deteriorating condition. There is a lack of accessible housing options, leading to limited choice for persons with disabilities, and a lack housing for households seeking to move from homelessness.

High housing costs limits choice. Housing that is affordable is in short supply. The low incomes in the area contribute to this challenge, and earnings have not kept pace with the inflationary pressure on housing costs. The high costs of housing development contributes to these high housing costs.

Neighborhoods with affordable housing options provide low access to opportunity. Many of the areas where minority households and families with children reside provide low access to opportunity in a variety of areas, including good schools, jobs, and labor market engagement.

Minority households have reduced access to homeownership. Fewer minority households and families with children were homeowners than the general population. Limited household income and high loan denial rates were contributing factors.

Persistent poverty reduces opportunity. There has been disinvestment in the community over decades, and there is a need to create a framework and economic climate to attract good-paying jobs. Transportation challenges, a lack of targeted training/education, and a lack of engagement in the workforce all contribute to this challenge.

There is a continued need for fair housing outreach, education, and enforcement. There are ongoing requests for assistance in addressing a variety of housing challenges, and for addressing fair housing complaints. There may be a lack of understanding of the growing minority population, and for fair housing rules and principles. There are also some language barriers.

Chapter 1: Introduction

This document has been prepared for the City of Mansfield, Ohio. Mansfield is much like many other Ohio communities. The City has a mix of housing types, and neighborhoods vary across the community. The City has newer developments and historic neighborhoods. Some neighborhoods are more affluent and well-maintained, while others are distressed and suffering from blight.

Mansfield, Ohio (pop. 47,630), the largest city in and county seat of, Richland County (pop. 124,936), was once a thriving hub of industrial activity, boasting large manufacturing companies including Westinghouse Electric, Tappan Stove and Ohio Brass. During the 1970's, Mansfield began to experience a series of sharp financial downturns when large employers moved their operations to other parts of the country, closed, or relocated overseas.

Like many similar rust belt communities, staggering economic changes resulted in the erosion of public institutions and infrastructure, a greatly reduced tax base, and the gradual disintegration of once thriving, working class neighborhoods like some of those in Mansfield.

The racial breakdown mirrors Midwest demographics with the majority of the City's residents being White (77.3%), followed by Black/African American (25.7%), Hispanic/Latino ethnicity (2.9%) and mixed or other races (the percentages provided here include the given race alone, and in combination with other races, so percentages may be higher than each single race, alone, as provided elsewhere in this document). This Analysis of Impediments to Fair Housing Choice outlines the data that demonstrates the complexion of the area and the identified barriers that prevent all residents from having place-based housing choice.

The value of the plan is fully realized in the Action Plan, which outlines practical action steps that the City of Mansfield can take to address impediments and more affirmatively further fair housing choice. An annual check point of specific measurables is included to enable the City to assess progress over time and contribute to the ongoing goal of the City as it relates to its charge to affirmatively further fair housing.

Purpose: Affirmatively Furthering Fair Housing

Equal and fair access to housing choice is a critical component of America's commitment to equality and opportunity for all. Title VIII of the United States Civil Rights Act of 1968, more commonly known as the Fair Housing Act, provides housing opportunity protection by prohibiting discrimination in the sale or rental of housing on the basis of race, color, religion, sex, and national origin. 1988 amendments to The Act establish an administrative enforcement mechanism, provide for stiffer penalties for failure to abide by its provisions, and expand its coverage to prohibit discrimination based upon familial status and disability. The U.S. Department of Housing and Urban Development (HUD), specifically HUD's Office of Fair Housing and Equal Opportunity (FHEO), is responsible for the administration and

enforcement of the Fair Housing Act and other civil rights laws. Provisions to affirmatively further fair housing (AFFH) are basic long-standing components of HUD's housing and community development programs.

In 2015, HUD published a final rule on Affirmatively Furthering Fair Housing, which outlined procedures that jurisdictions and public housing authorities who participate in HUD programs must take to promote access to fair housing and equal opportunity. This rule required grantees and housing authorities to take meaningful actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected class characteristics. Under this final rule, grantees were required to take actions to address disparities in housing need, replace segregated living patterns with integrated and balanced living patterns; transform racially and ethnically concentrated areas of poverty into areas of opportunity, and foster and maintain compliance with civil rights and fair housing laws. However, in August of 2020, HUD replaced the 2015 AFFH rule with a rule called "Preserving Community and Neighborhood Choice (PCNC)", which redefined the AFFH requirements and redefined the term fair housing.

Equal and fair access to housing choice is a critical component of America's commitment to equality and opportunity for all.

The PCNC rule was, in turn, replaced with "The AFFH Interim Final Rule (IFR)" on July 31, 2021. The IFR restores certain definitions and certifications that are grounded in legal precedent to HUD's regulations implementing the Fair Housing Act's requirement to affirmatively further fair housing (AFFH). The IFR rescinds and replaces the Preserving Community and Neighborhood Choice (PCNC) rule.

Local governments that are required to submit consolidated plans to HUD are subject to the AFFH certification requirements in the IFR, which incorporate the IFR's restored definitions, as a condition of receiving Federal funds from HUD. Certifications submitted after the effective date of the rule will incorporate and be subject to the IFR's requirements.

Such funding recipients are also subject to the record-keeping requirements contained in the IFR. The IFR does not reinstate the obligation to conduct specific fair housing planning to support such certifications. Instead, it requires that covered program participants appropriately certify that they will AFFH, consistent with the definitions in the IFR, and provides for HUD support of voluntary fair housing planning to support certifications. Under the IFR, all program participants will be certifying to the restored familiar and legally supportable definition of what it means to AFFH, i.e., that they will take meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially or ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. Consolidated plan program participants are also to refer to their applicable program

The IFR rule requires grantees to take meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity.

requirements for their specific certification requirements at 24 CFR part 97 as amended by the IFR.

While the 2015 rule required a program participant to conduct an Assessment of Fair Housing (AFH) to support its certification (the AFH

was an analysis of fair housing data, an assessment of fair housing issues and contributing factors, and an identification of fair housing priorities and goals submitted to HUD using the HUD provided Assessment Tool), under the IFR, program participants are not required to undertake fair housing planning using any mandated format to support this restored certification. This means the IFR does not require program participants to conduct an AFH or an Analysis of Impediments to Fair Housing Choice (AI), which was the fair housing planning that program participants were previously required to develop until such time that they were subject to the AFH requirement of the 2015 AFFH rule and prior to the PCNC rule. Under the IFR, program participants are not required to engage in any specific, mandated fair housing planning process, and they are not required to submit their fair housing planning documents to HUD for review. Under the IFR, a HUD program participant may determine how best to engage in the fair housing planning process, so long as it can appropriately certify that it is meeting the AFFH obligation, consistent with the restored definition of AFFH. This means that a program participant that voluntarily engages in fair housing planning can choose to conduct or update an AFH or AI, continue to implement an AFH, or an AI, or engage in another form of fair housing planning. The City of Mansfield is choosing to conduct an Analysis of Impediments, which is the longstanding way of conducting a local fair housing needs assessment, but with the use of some of the tools and data that came out of the 2015 rule. The City will prepare, follow, and keep on file a current 'Analysis of Impediments to Fair Housing Choice' (AI).

In an AI, local communities that receive HUD entitlement grant funds evaluate barriers to fair housing choice and develop and implement strategies and actions to overcome any identified impediments based on their individual histories, circumstances, and experiences. Through this process, local entitlement communities seek to:

- promote fair housing choices for all persons, including classes protected under the Fair Housing Act;
- analyze and eliminate housing discrimination within the jurisdiction;
- provide opportunities for racially and ethnically inclusive patterns of housing occupancy;
- identify structural and systemic barriers to fair housing choice; and
- promote housing that is physically accessible and usable by persons with disabilities.

HUD will presume that the grantee is meeting its obligation and certification to affirmatively further fair housing by taking actions that address the impediments. Through its Community Planning and Development (CPD) programs, HUD's goal is to expand mobility and widen a person's freedom of choice. The Department also requires Community Development Block Grant (CDBG) program grantees to document Affirmatively Further Fair Housing Choice (AFFH) actions in the annual performance reports that are submitted to HUD.

Definitions

Affirmatively Further Fair Housing: In keeping with the latest proposed guidance from HUD, to Affirmatively Further Fair Housing Choice (AFFH) is to comply with the 1968 Fair Housing Act, and more specifically, the local government's obligation to develop housing policies that achieve meaningful outcomes in regards to fair housing, so every American regardless of race, color, national origin, religion, sex, disability or familial status, can exercise the right to fair and equitable housing choice.

Fair Housing Choice: The ability of persons of similar economic means to have available to them equal housing choices regardless of race, color, religion, sex, national origin, familial status, or disability.

Impediments to Fair Housing Choice: Any actions, omissions, or decisions taken because of, or which have the effect of restricting housing choices or the availability of housing choices on the basis of, race, color, religion, sex, disability, familial status, or national origin.

Protected Classes: Federally protected classes include race, color, national origin or ancestry, sex, religion, familial status, mental disability, or physical disability. Ohio has added military status, ancestry, and age (40 and over) as additional classes.

Affordable Housing: Housing that costs no more than 30% of a household's total monthly gross income. For homeowners, the 30% amount would include the mortgage payment, interests, property taxes, homeowner's insurance, and any homeowners' association fees. For rental housing, the 30% amount would include rent plus any tenant-paid utility costs.

Sources of Data

Many elements go into the development of a proper Analysis of Impediments. Below is a summary of the basic elements that we captured and assessed. Where prior studies were done, we often referred to them or relied upon that data rather than duplicating previous work, and cited those studies in our bibliography at the end of this report. This gave us the opportunity to focus on analyzing the data to more fully understand the challenges, and on developing sound recommendations.

We used the State of Ohio as a good comparison demographic throughout much of the data analysis. For certain key characteristics where we wanted to compare the dispersion of a characteristic across the City, we also looked at the data across census tracts that make up the City.

2022 American Community Survey (ACS): The American Community Survey is an ongoing statistical survey that samples a small percentage of the U.S. population every year, thus providing communities with more current population and housing data throughout the 10 years between censuses. This approach trades the accuracy of the Decennial Census Data for the relative immediacy of continuously polled data from every year. ACS data is compiled from an annual sample of approximately 3 million addresses rather than an actual count (like the Decennial Census's SF 1 data) and therefore is susceptible to sampling errors. This data is released in two different formats: single year estimates and multi-year estimates. We most often used the ACS 5-year estimates.

For certain key characteristics where we wanted to compare the dispersion of a characteristic across the City, we also looked at the data across census tracts that make up the City.

2020 and 2010 Census Summary File 1 (SF 1): This dataset contains what is known as “100% data,” meaning that it contains the data collected from every household that participated in the Census and is not based on a representative sample of the population. This dataset is quite broad in terms of coverage of the total population; it is limited in the depth of the information collected. Basic characteristics such as age, sex, and race are collected, but not more detailed information such as disability status, occupation, and income. The statistics are available for a variety of geographic levels with most tables obtainable down to the census tract or block group level.

HUD’s Affirmatively Furthering Fair Housing Tool: Online database and mapping tool (<https://affirmativelyfairhousing.hud.gov/>). HUD provides data on race and ethnicity, national origin, LEP, publicly supported housing, housing problems, housing tenure, poverty, and disability and indices on environmental health, school proficiency, job proximity, labor market, and transportation. AFFH version 06 was used in completing this report.

HUD CPD Maps: Online mapping tool egis, found at <https://gis.hud.gov/cpd/>. Maps are based on ACS data, along with data from a variety of sources. This information is used within this document to create a variety of maps, which are useful in demonstrating geographic differences across the City with respect to a variety of indicators.

United States Department of Labor, Bureau of Labor Statistics: Information on the economic climate, the workforce, and employment within the City, can be found on their website, at <https://www.bls.gov/bureau-of-labor-statistics/>.

Local Data: the related Fair Housing Statistics maintained by the City’s Fair Housing Administrator, along with the Consolidated Plans, Annual Plans, CAPERS, a recent housing study, and other local documents have all been useful in developing this report. In addition, as outlined in the following Chapter, information collected directly from the public and stakeholders in a variety of ways were also important sources of information.

Chapter 2: Community Participation

Community Engagement Overview

The Analysis of Impediments to Fair Housing Choice involved gathering input regarding fair and affordable housing conditions, perceptions, and needs. A variety of approaches to achieve meaningful public engagement with residents and stakeholders were used,

A variety of approaches were used to achieve meaningful public engagement with residents and other stakeholders, including both public and stakeholder surveys, virtual and in-person public meetings, and multiple interviews.

including public meetings, interviews, and surveys.

Outreach was made to the public to participate in an on-line survey and in two public meetings, in a variety of ways. Links for the on-line survey and the virtual meeting were provided on the City's website. Public

notices were placed in the newspaper announcing the participation options, and informational brochures were created that included invitations to participate. These were sent to local agencies serving low-income persons and neighborhoods. These agencies were also asked to help us to get the word out to the community.

Local stakeholders and stakeholder agencies that address fair housing, serve low-income persons, seek to address homelessness, supply housing needs, provide services, and are working to strengthen neighborhoods were also emailed directly to invite them to participate in a separate stakeholder survey, and to attend the public meetings. These organizations were also asked to help in spreading the word to the public about their participation opportunities.

During the Public meetings there was a presentation of information gathered through the initial data analysis, and public input gathered through the surveys. Opportunities were also offered for the public to participate during these meetings through polling on community needs surrounding housing, the community, and the economy, and through discussion of and prioritization of needs through a facilitated process. A comment period was also provided following the presentation of a draft document, and public comments were considered in the final draft.

There were 46 survey responses collected from community stakeholders and residents. 19 residents completed the public surveys. 43 stakeholders were reached out to requesting survey completion, and 16 stakeholders completed the surveys. Additionally 5 stakeholders completed in-person interviews.

Community Engagement Results

Public Meeting

The highest scoring barrier was with regard to accessibility.

Both the public survey and the stakeholder survey had questions specifically regarding fair housing, in addition to questions on a number of related housing and community development topics. The survey answers are helpful to the City as they seek to reduce barriers to fair housing. The top

five barriers identified by public survey respondents, in order of number of respondents that identified each as a barrier, are as follows:

- Landlord discriminatory or unethical practices
- Barriers to accessibility
- Limited financial assistance for home ownership of elderly, minorities, and/or low-income households
- Lack of public education/awareness regarding rights and responsibilities
- Limited financial assistance for renters

Additional barriers identified by public survey respondents included building or zoning regulations, real estate/realtor discriminatory or unethical practices, banking/lending/mortgage discriminatory or unethical practices, municipal regulations and ordinances, lack of housing supply, and high taxes. Some respondents believed that no barriers existed.

The top five barriers identified by stakeholder survey respondents, in order of number of respondents that identified each as a barrier, are as follows:

- Landlord discriminatory or unethical practices
- Limited financial assistance for renters
- Limited financial assistance for home ownership of elderly, minorities, and/or low-income households
- Lack of public education/awareness regarding rights and responsibilities
- Barriers to accessibility

Additional barriers identified by stakeholder survey respondents included building or zoning regulations, municipal regulations and ordinances, real estate/realtor discriminatory or unethical practices, eviction/expungement opportunities, the common opinion that there is no problem, housing costs, and lack of housing supply.

A set of polls were taken at the public meeting that involved a number of questions about the use of available, but limited, resources to address housing and community development needs. Here are the questions relative to fair housing:

City of Madison, Wisconsin Annual Action Plan 2025 – Housing (p. 16 of 17)

1. Question One: If the City could only expend the available dollars in one of the following categories, which would you choose?
 - Housing (homeownership, rental housing, and/or fair housing). Selected by seven (7) respondents.
 - Public facilities and services. Selected by zero (0) respondents.
 - Neighborhood revitalization, safety, and infrastructure. Selected by three (3) respondents.
 - Economic vitality and job creation. Selected by two (2) respondents.
2. Question Two: If the City had to choose between funding among the following categories, and could only choose one, which would you choose?
 - Fair housing programming and services. Selected by zero (0) respondents.
 - Homeownership assistance. Selected by five (5) respondents.
 - Rental housing development. Selected by four (4) respondents.
 - Owner-occupied rehabilitation. Selected by one (1) respondent.
 - Acquisition/rehabilitation/resale. Selected by zero (0) respondents.
 - Tenant-based rental assistance. Selected by one (1) respondent.
 - Housing solutions for the homeless. Selected by zero (0) respondents.

City of Mansfield, Ohio - Annual Action Plan - 2025 - Survey Results

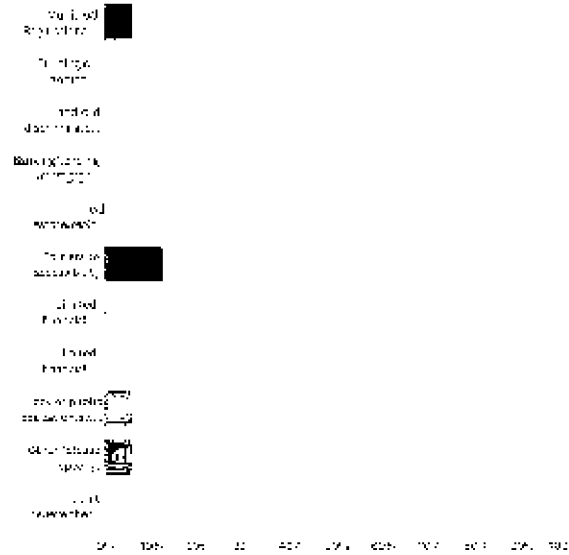
Which of the following do you believe to be barriers to fair housing choice in Richland County (outside of the City of Mansfield, if any)? (mark all that apply)

Public accommodations
 Family status
 Disability
 Sex
 Age
 Race
 Religion
 National origin
 Ancestry
 Marital status
 Source of income
 Other (please specify): _____
 None of the above
 Other (please specify): _____

| ANSWER CHOICES | RESPONSE |
|--|---------------------------|
| Public accommodations | 10.71% 0 |
| Family status | 41.76% 8 |
| Disability | 54.86% 11 |
| Sex | 9.29% 2 |
| Age | 8.57% 2 |
| Race | 57.14% 12 |
| Religion | 31.43% 6 |
| National origin | 54.86% 11 |
| Ancestry | 54.86% 11 |
| Marital status | 54.86% 11 |
| Source of income | 54.86% 11 |
| Other (please specify): _____ | 5.71% 1 |
| None of the above | 14.29% 3 |
| Other (please specify): _____ | |
| 1. OTHER (PLEASE SPECIFY) Employment - discrimination by employer | DATE: 12/22/2024 10:29 AM |
| 2. Total - 100% (11 responses) - 11 | 12/22/2024 11:02 AM |
| 3. % of housing supply | 12/22/2024 11:02 AM |

City of Mansfield, Ohio - Annual Action Plan - 2021 - Housing Choice

Which one in the following list do you perceive to be the largest impediment to fair housing choice in the City of Mansfield/Richard County, if you perceive that impediments exist? (choose only one)



| ANSWER CHOICES | RESPONSES |
|------------------------------------|-----------|
| Multiple Blacklisting or Evictions | 0 (0%) |
| Higher costs | 15 (100%) |
| Limited job market | 15 (100%) |
| Being unable to afford | 15 (100%) |
| Limited network | 15 (100%) |
| Fair housing assistance | 15 (100%) |
| Limited mobility | 15 (100%) |
| Limited income | 15 (100%) |
| Eviction history | 15 (100%) |
| Credit history | 15 (100%) |
| Poor credit score | 15 (100%) |
| Other | 15 (100%) |
| Limited network | 15 (100%) |

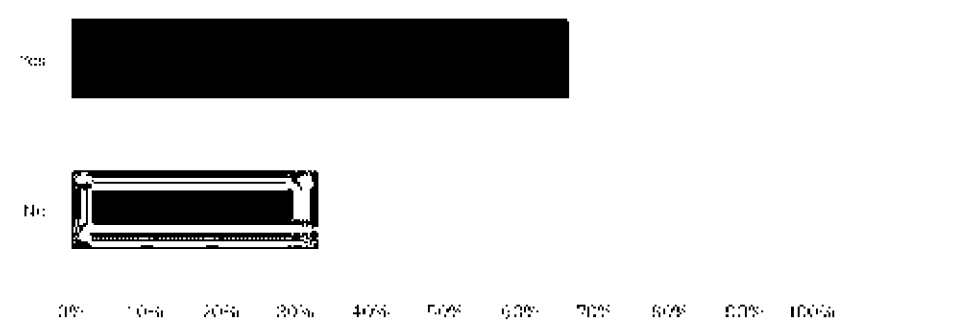
7. For the item that you selected in the question above, what suggestions do you have for addressing that barrier?

For the item that you selected in the question above, what suggestions do you have for addressing that barrier?

| 4 | RESPONSES | DATE |
|----|---|---------------------|
| 1 | From a research perspective, I would suggest that | 12/22/2020 12:27 PM |
| 2 | From a research perspective, I would suggest that | 12/22/2020 12:21 PM |
| 3 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 4 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 5 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 6 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 7 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 8 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 9 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 10 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 11 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 12 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 13 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 14 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |
| 15 | From a research perspective, I would suggest that | 12/22/2020 12:19 PM |

Public Survey – Fair Housing Questions

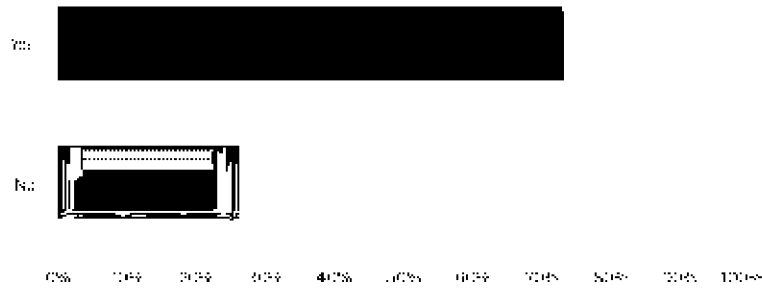
Discrimination in housing is anything done to restrict access or availability of housing to someone because of their race, color, religion, sex, disability, familial status, or national origin. Are you familiar with fair housing services provided in the community?



| ANSWER CHOICES | RESPONSES | COUNT |
|----------------|-----------|-------|
| Yes | 88.63% | 13 |
| No | 11.37% | 2 |
| DK/ML | | 0 |

7. Do you have any comments or suggestions regarding the survey questions?

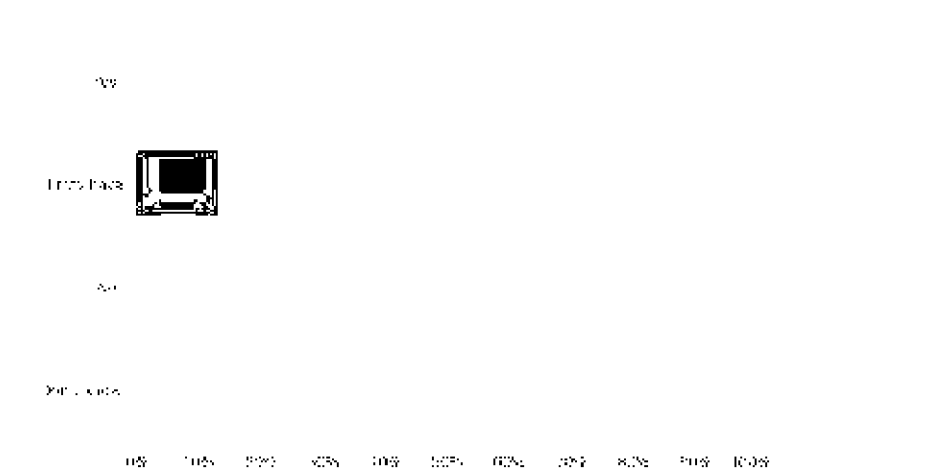
Have you seen or heard information regarding fair housing programs, laws, or enforcement in the community?



| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----------|
| Yes | 76.3% | 11 |
| No | 23.7% | 4 |
| TOTAL | | 15 |

7. Equity and Fairness (10%) - Affordable Housing - 2025 - 2026 - 100% (10%)

Have you ever experienced housing discrimination, as described, in your local area?



| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|----|
| Yes | 0.00% | 0 |
| Maybe | 4.17% | 4 |
| No | 95.83% | 96 |
| DATA SOURCE | 10/12/20 | 10 |

7. Do you know someone who has experienced housing discrimination, as described, in your local area?

Do you know someone who has experienced housing discrimination, as described, in your local area?



Do you know

0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|----|
| Yes | 20.0% | 2 |
| No | 80.0% | 8 |
| Don't Know | 0.0% | 0 |
| TOTAL | | 10 |

7. If you believe that you or someone you know encountered housing discrimination in your local area, which of the following best describes the type of discrimination?

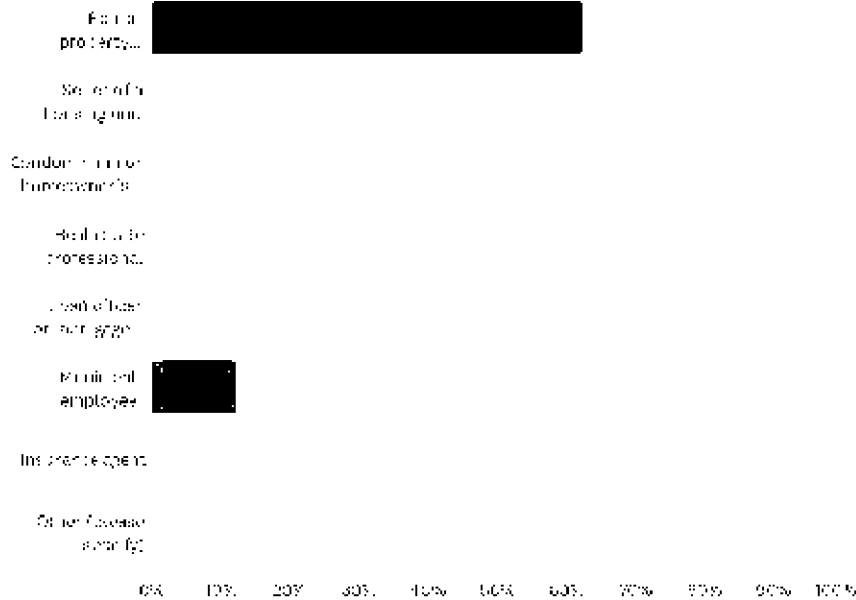
Refusing, discouraging, or charging more to rent an apartment or purchase a home.
 Discouraging a person from buying, leasing, or otherwise wanting to live in a particular neighborhood by steering them or telling them that a house, apartment, complex or neighborhood is not available.
 Refusing to make a loan or to get a loan to buy or refinance a house unless you have equity by doing things like charging more money or other less favorable deal than someone should be able to get if he or she shopped around.
 Refusing, discouraging or charging more for home insurance.
 Discrimination based on disability. Refusing to make a reasonable accommodation for a person with a disability. Refusing to allow a modification to make a residential unit accessible for a person with a disability. Refusing to accept a person with a disability as a tenant or as a resident of an accessible unit.
 Predatory lending or unfair, misleading, deceptive or fraudulent loan practices.
 Refusal to accommodate service animals or emotional support animals.
 Other (please specify): _____

| ANSWER CHOICES | PERCENTAGE | COUNT |
|--|------------|----------|
| Refusing, discouraging, or charging more to rent an apartment or purchase a home. | 57.50% | 7 |
| Discouraging a person from buying, leasing, or otherwise wanting to live in a particular neighborhood by steering them or telling them that a house, apartment, complex or neighborhood is not available. | 12.50% | 1 |
| Refusing to make a loan or to get a loan to buy or refinance a house unless you have equity by doing things like charging more money or other less favorable deal than someone should be able to get if he or she shopped around. | 0.00% | 0 |
| Refusing, discouraging or charging more for home insurance. | 0.00% | 0 |
| Discrimination based on disability. Refusing to make a reasonable accommodation for a person with a disability. Refusing to allow a modification to make a residential unit accessible for a person with a disability. Refusing to accept a person with a disability as a tenant or as a resident of an accessible unit. | 12.50% | 1 |
| Predatory lending or unfair, misleading, deceptive or fraudulent loan practices. | 0.00% | 0 |
| Refusal to accommodate service animals or emotional support animals. | 12.50% | 1 |
| Other (please specify): | 20.00% | 2 |
| TOTAL | | 8 |

| # | OTHER (PLEASE SPECIFY) | DATE |
|---|---|--------------------|
| 1 | Child's poor behavior in the classroom is our biggest issue. It's large and growing percentage of issues in this school district (compared to others) can show up to 400 child abuse reports at home. What are we doing with our worst offenders? It is an issue that gets dismissed but it impacts a neighbor's needs. | 2/15/2024 12:02 PM |
| 2 | NA | 2/14/2024 3:11 PM |

7. If you did not select "Other (Please Specify)", which of the following best describes the person or organization that discriminated against you or the person you know?

If yes, which of the following best describes the person or organization that discriminated against you or the person you know?



| ANSWER CHOICES | RESPONSES | |
|--|-------------------|---|
| Real estate professional | 0% | 0 |
| Sales agent | 0% | 0 |
| Condominium or homeowners' association | 0% | 0 |
| Real estate professional | 0% | 0 |
| Loan officer or mortgage broker | 0% | 0 |
| Multiple employee | 12.50% | 1 |
| Insurance agent | 0% | 0 |
| Other (Please specify) | 25.00% | 2 |
| TOTAL | | 3 |
| 4 OTHER (PLEASE SPECIFY) | DATE | |
| 1 Not available. | 1/15/2025 2:00 PM | |
| 2 NA | 1/14/2025 2:11 PM | |

Which of the following do you believe to be barriers to fair housing choice in the City of Mansfield, if any? (mark all that apply):

Multiple Regulatory Barriers
 Limited Housing Stock
 Limited Income
 Limited Access to Job Opportunities
 Limited Access to Transportation
 Limited Access to Education
 Limited Access to Healthcare
 Limited Access to Social Services
 Limited Access to Financial Services
 Limited Access to Information

Other (specify): _____
 Other (specify): _____
 Other (specify): _____

None of the Above
 Other (specify): _____
 Other (specify): _____
 Other (specify): _____
 Other (specify): _____
 Other (specify): _____
 Other (specify): _____
 Other (specify): _____
 Other (specify): _____

ANSWER CHOICES

- Multiple Regulatory Barriers
- Limited Housing Stock
- Limited Income
- Limited Access to Job Opportunities
- Limited Access to Transportation
- Limited Access to Education
- Limited Access to Healthcare
- Limited Access to Social Services
- Limited Access to Financial Services
- Limited Access to Information
- None of the Above
- Other (specify): _____
- Other (specify): _____
- Other (specify): _____
- Other (specify): _____
- Other (specify): _____
- Other (specify): _____
- Other (specify): _____
- Other (specify): _____

RESPONSES

| | |
|--------------------------------------|---|
| Multiple Regulatory Barriers | 0 |
| Limited Housing Stock | 1 |
| Limited Income | 1 |
| Limited Access to Job Opportunities | 1 |
| Limited Access to Transportation | 4 |
| Limited Access to Education | 2 |
| Limited Access to Healthcare | 1 |
| Limited Access to Social Services | 0 |
| Limited Access to Financial Services | 1 |
| Limited Access to Information | 0 |
| None of the Above | 1 |
| Other (specify): _____ | 5 |

Total Responses: 14

City of Mansfield, Ohio - Annual Action Plan - 2025 - Survey Question 6

Which of the following do you believe to be barriers to fair housing choice in Richland County (outside the City of Mansfield), if any? (mark all that apply):

Multiple Regional and Local Areas

Existing zoning regulations

Land use and historic preservation

Lack of public transportation

Local income inequality

Lack of affordable housing

Local income inequality

Local income inequality

Lack of public transportation

Local income inequality

Local income inequality

Local income inequality

0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18

ANSWER CHOICES

Multiple Regional and Local Areas

Existing zoning regulations

Land use and historic preservation

Lack of public transportation

Local income inequality

Local income inequality

Lack of affordable housing

Local income inequality

Lack of public transportation

Local income inequality

Local income inequality

Local income inequality

Local income inequality

RESPONSES

11 00%

1 7%

1 7%

11 77%

5 36%

10 77%

40 29%

16 11%

16 11%

2 15%

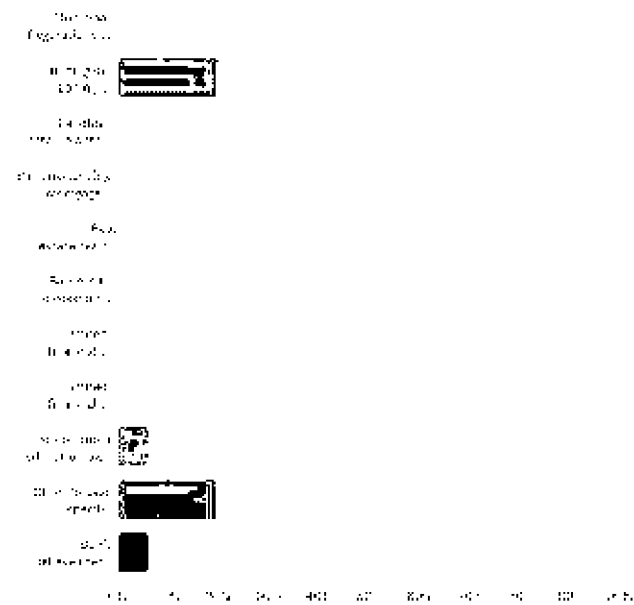
1 7%

11 78%

Total Responses: 13

City of Mansfield Survey - Affordable Housing - 2021 - 2022

Which of the above list do you perceive to be the largest impediment to fair housing choice in the City of Mansfield/Richland County, if you perceive that impediments exist? (choose only one)



ANSWER CHOICES

RESPONSES

| | |
|---|-----------|
| Lack of affordable housing units | 8 |
| High cost of housing | 2 |
| Discrimination in housing | 2 |
| Lack of information about housing opportunities | 1 |
| Lack of transportation options | 1 |
| Lack of job opportunities | 1 |
| Lack of social services | 1 |
| TOTAL | 16 |

City of Mansfield/County of Richland Engagement - 2021 - 2022

Are there examples of segregation in the City of Mansfield/Richland County? Examples would be pockets of minorities or concentrations of low-income households

Yes



11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32

| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|----|
| Yes | 61.32% | 11 |
| No | 38.68% | 7 |
| TOTAL | | 18 |

City of Mansfield/County of Richland Equity and Inclusion Committee

Do you believe that discriminatory or unethical practices contributed to segregation in the City of Mansfield/Richland County?

Yes


No


0% 10% 20% 30% 40% 50% 60% 70% 80% 90% 100%

ANSWER CHOICES

Yes

No

U.S.C.

RESPONSES

5 (10%)

5 (10%)

5

5

14

Chapter 3: Demographic/Socioeconomic Profile

Demographics

Geography: The City of Mansfield is located in Richland County in the North Central part of the State of Ohio. It is the largest City in the County and the County seat. The City of Mansfield is roughly about half-way between the Cities of Columbus and Cleveland, and is surrounded by rural farmland and smaller villages and towns. Geographically, the City encompasses approximately 31 square miles.

Photo 3A: Downtown Mansfield (Google Maps).



The City was founded on a fork of the Mohican River in 1808. Mansfield was once a thriving hub of industrial activity, boasting large manufacturing companies including Westinghouse Electric, Tappan Stove and Ohio Brass. During the 1970's, Mansfield began to experience a series of sharp financial downturns when large employers moved their operations to other parts of the country, closed, or re-located overseas.

Like many similar rust-belt communities, staggering economic changes resulted in the erosion of public institutions and infrastructure, a greatly reduced tax base, and the gradual disintegration of once thriving, working class neighborhoods. Inadequate jobs, blight, and an aging housing stock are ongoing challenges.

Map 3A: City of Mansfield and surrounding area with numbered census tracts

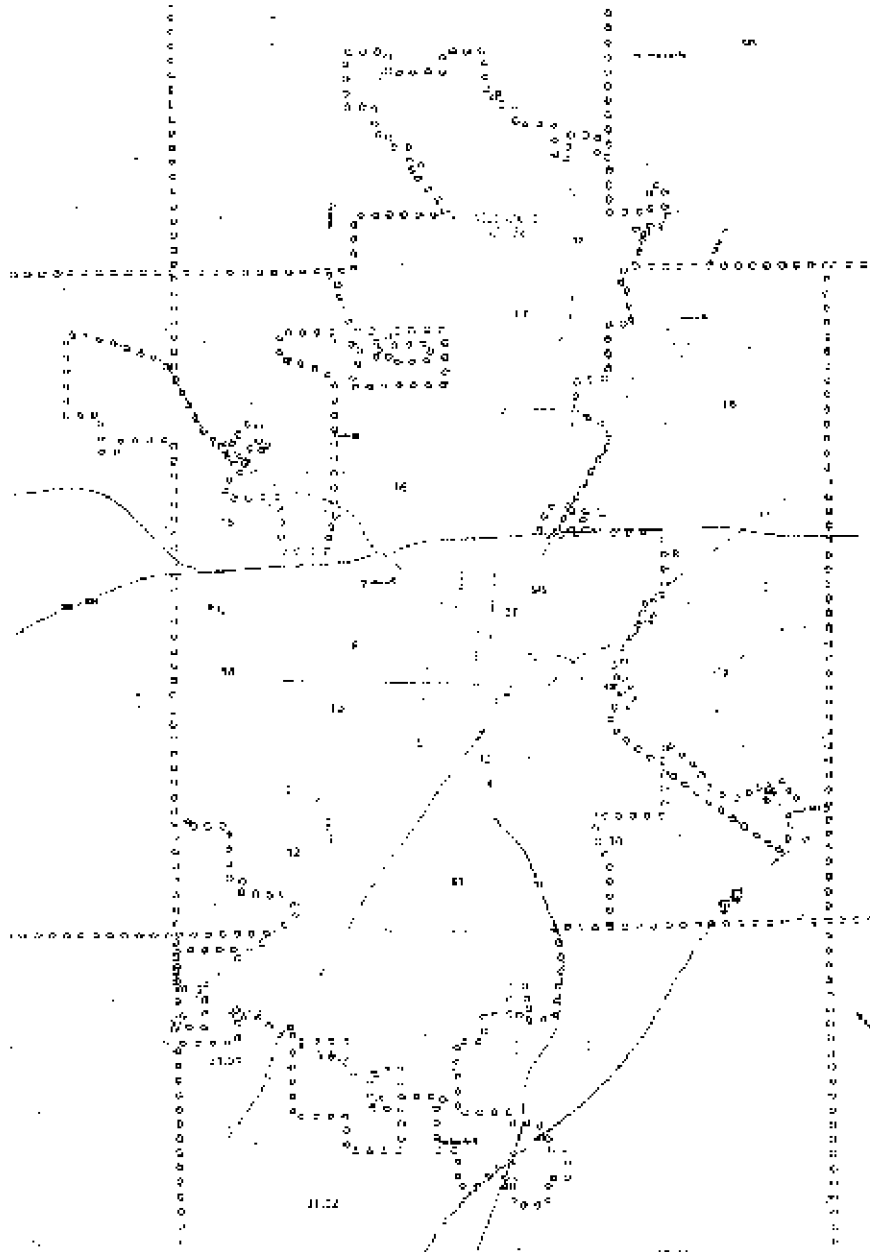
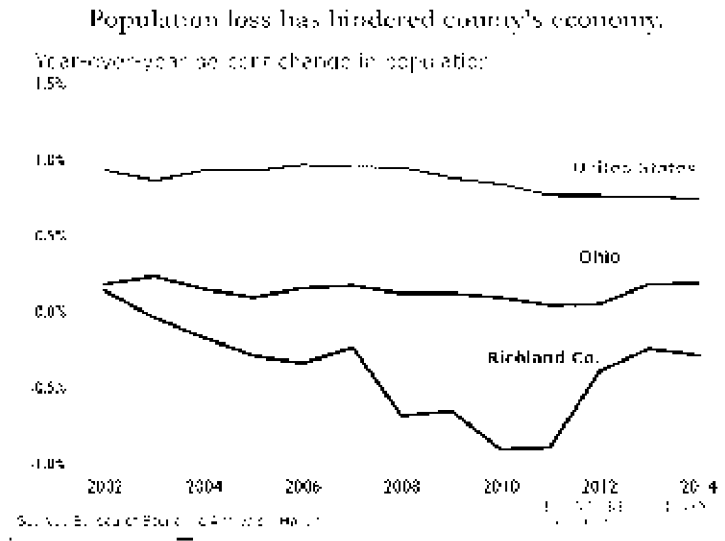


Photo 3B: Sample of Housing in Mansfield, Ohio (Google Maps)



Population and population Growth: The population of the City of Mansfield, according to the 2022 ACS was 47,855, and has risen slightly in the last few years, though historically, there has been a decline in population. The population in 1970 was 55,047, and has fallen in each decennial census since that time. This population decline over decades has also occurred in the surrounding County, but with a rise in population starting in 2011, as seen in Graph 3A.

Graph 3A: Population Change Over Time



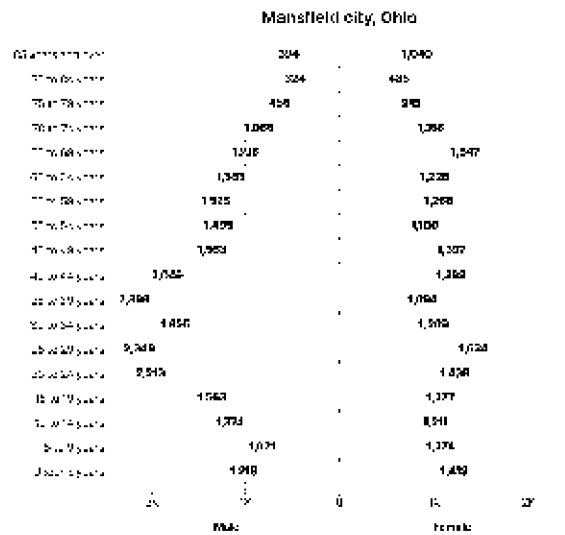
Sex: There are some other differences based upon sex that are worth noting, and that may have potential ramifications for fair housing issues. According to the 2022 ACS, 46.4% of the population in the City of Mansfield was female and 53.6% was male. This is a somewhat higher than usual male population percentage. Also note that there is a larger than average number of people living alone in the City: 49.1% of households are a single person living alone. This compares to 36.2% for the State of Ohio overall. There appears to be a

City of Mansfield, Ohio | Annual Action Plan | 2025 | Page 16 of 17

population of 2,447 men under the age of 65, and living alone in the City with no family, and a population of 1,842 women under the age of 65, and living alone in the City with no family.

This population dynamic changes as the age increases, with more women than men in every age category over the age of 64. This is likely because women tend to live longer than men. The percentage of persons over the age of 65 and living alone is also higher than average, with 52.0% of all households with one or more people 65 and over consisting of a single person living alone. There is a population of 2,380 women 65 and over living alone, compared to a population of 1,074 men 65 and over living alone in the City. These statistics have potential ramifications for housing, because these single-income households may have difficulty in affording housing, especially those 65 and over on fixed incomes.

Graph 38: Population Pyramid: Population by Age and Sex



2022 ACS 5-Year Estimates Subject Tables

There is also an interesting dynamic relative to single parent households. According to the 2022 ACS, there were both male and female householders, with no spouse present, and children in the home under the age of 18, but there is a huge disparity between the numbers of male and female householders in this situation. 66% of all households were male family householders with own children, no wife present. 8.0% of all households were female family householders with own children, no husband present.

41.2% of those under the age of 18 were living below the poverty level.

This disparity has potential ramifications that are likely to disproportionately impact females across the City in a variety of areas, but especially relevant to this report are the implications for housing, which may be more difficult to secure based upon the presence of children and the impact of child-bearing as a single parent on one's income. In fact, the ACS data also shows that 41.2% of those under the age of 18 were living below the poverty level.

The other, and related challenge is the disparity in earnings between men and women in the workforce. As shown in Table 3A, even after accounting for educational attainment, median earnings for females were far below those of their male counterparts. This too has implications for access to affordable housing in the market.

Even after accounting for educational attainment, median earnings for females were far below those of their male counterparts.

earnings for females were far below those of their male counterparts. This too has implications for access to affordable housing in the market.

Table 3A: Median earnings in the past twelve months (in 2022 inflation-adjusted dollars) by sex, by educational attainment for the population 25 years and over

| Education, by sex | Annual income |
|---|---------------|
| Male | \$36,401 |
| Less than high school graduate | \$26,944 |
| High school graduate (includes equivalency) | \$33,139 |
| Some college or Associates degree | \$34,960 |
| Bachelor's degree | \$42,371 |
| Graduate or Professional degree | \$102,636 |
| Female | \$28,717 |
| Less than high school graduate | \$23,495 |
| High school graduate (includes equivalency) | \$23,970 |
| Some college or Associates degree | \$28,778 |
| Bachelor's degree | \$29,754 |
| Graduate or Professional degree | \$61,721 |

Data source: 2022 ACS

Age: Those over the age of 65 are also a demographic facing some structural challenges that can lead to a disadvantage in having their housing needs adequately met. 18.1% of the population in the City of Mansfield are 65 and over, and 34.6% of all households have at least one person 65 years and over. Older people are more likely to be on a fixed income, and also more likely to live alone. As described above, 40.1% of all households in the City of Mansfield are single householders living alone, and 52.0% of all households with persons 65 and over live alone. This combination impacts their earning ability, and thus their access to affordable housing.

Older people are more likely to be on a fixed income, more likely to be disabled, and more likely to live alone.

Older people are also more likely to be disabled, as described in the section on Population with Disabilities. This too imparts their access to appropriate housing.

Veterans: According to the 2022 ACS, 8.5% of the population in the City of Mansfield are veterans. Veterans are more likely to have disabilities and health issues than the population at large. These challenges can impact their access to affordable and appropriate housing.

Religion: People in the City of Mansfield are affiliated with a variety of religions. Though we did not find detailed statistics for the City of Mansfield, the Pew Research Center data in Table 3B represents the religious landscape in Ohio. Religion, which is often tied to ethnicity or race, can be a source of discrimination.

Table 3B: Religious composition of adults in Ohio

| | | | |
|-------------------------------|-----|----------------------------------|-----|
| Christian | 73% | Non-Christian Faiths | 4% |
| Evangelical Protestant | 29% | Jewish | 1% |
| Mainline Protestant | 17% | Muslim | 1% |
| Historically Black Protestant | 7% | Buddhist | 1% |
| Catholic | 18% | Hindu | <1% |
| Mormon | 1% | Other World Religions | <1% |
| Orthodox Christian | <1% | Other Faiths | 2% |
| Jehovah's Witness | 1% | Unaffiliated (Religious "nones") | 22% |
| Other Christian | <1% | Atheist | 2% |
| Don't know | <1% | Agnostic | 3% |
| | | Nothing in particular | 17% |

Data source: Pew Research Center, *Religious Landscape Study, 2014*

Economy: The City, once a bustling manufacturing center due to its location on four railroads that passed through the City and on the Lincoln Highway, the first road across

The City has had its economic struggles, but is making progress in recent years.

America. The Ohio Brass Company, the Mansfield Tire and Rubber Company and appliance manufacturing industries including Westinghouse Electric and Tappan Stove, among others, were all major employers in the area. However, like many cities in the rust belt, Mansfield experienced a large

decline in its manufacturing and retail sectors starting in the 1970s with losses to overseas manufacturing, labor disputes, and deteriorating factory facilities all contributing to the decline. This led to declining incomes and blighted neighborhoods. The local government also struggled as the tax base shrank. Finally, in 2010, Mansfield was declared to be in fiscal emergency with a deficit of \$3.5 million. The city's financial crisis lasted nearly four years before being lifted out of fiscal emergency on July 9, 2014.

While some manufacturing remains, the City has sought to diversify its economy, and is making efforts to revitalize its downtown. Its economy is continuing to gain momentum, but much work needs to be done. Major current industries include Healthcare (Ohio Health), Auto parts (Newman Technology and Ideal Electric), thermostats (Therm-O-Disc), pumps (Gorman-Rupp), Steel and metal working (Jay Industries, AK Steel, Defasco), and Food (Italy Dairy, Stewart's Restaurants, Jones Potato Chip Company).

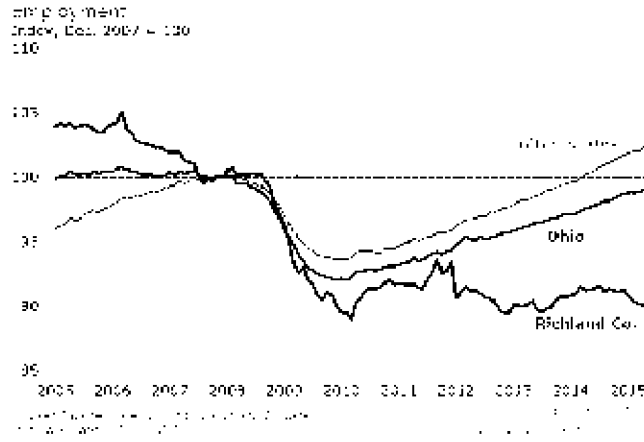
As shown in Table 3C, the percentage employed (45.4%), unemployment rate (7.8%), and the median household income (\$40,996) are all poor compared to the State averages. As of February 2024, Rich and County, which includes the City of Mansfield ranked 27th out of 88 Ohio Counties for Unemployment rate, meaning that 61 of the 88 Ohio Counties had a lower unemployment rate. Graph 3C shows that the quarterly employment in Richland County has continued to be stagnant over time. Per capita personal income has risen, (Graph 3D), but not enough to keep pace with rising housing costs. Median value of owner-occupied homes have increased from \$77,000 in 2017 to \$97,300 in 2022. This is an increase of 26% in 5 years. Over the same time period, median household income increased from \$34,219 in 2017 to \$40,996 in 2022. This is an increase of 20%. This leaves the average household less able to afford housing today.

Table 3C: Employment and income in the City of Mansfield

| | City of Mansfield | State of Ohio |
|-------------------------|-------------------|---------------|
| Percentage employed | 45.4% | 59.9% |
| Unemployment rate | 7.8% | 5.0% |
| Median household income | \$40,996 | \$66,990 |

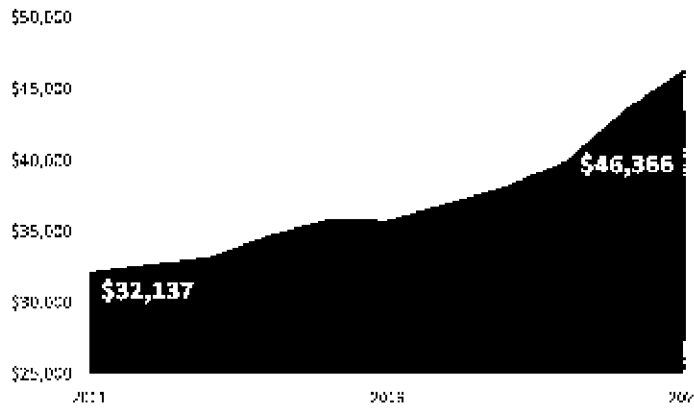
Data source: PWT/ACS

Graph 3C: Employment Growth Over Time



Graph 3D: Per Capita Personal Income for the Mansfield Metropolitan Area, which includes Richland County, 2011 - 2021

Per Capita Personal Income



Data Source: Ohio County Profiles, prepared by the Office of Research, Ohio Development Services Agency

City of Mansfield Consolidated Plan: Annual Action Plan 2025 (Appendix C)

A number of economic challenges exist. In addition to the above noted concerns about an ongoing lack of good jobs, considerably lower than State average incomes, and stagnated employment growth over time, 25% of the overall population are living below the poverty line.

However, a number of challenges exist. 13% of the overall population are living below the poverty line, and 23,664 people are below 50% of the poverty level.

Race and Ethnicity

The City of Mansfield is seeing a modest increase in its diversity over time. In 2012, 72.4% of City residents were White alone; in 2022 that number was 70.0%. The numbers are reflective of a general trend in Ohio and across the nation of increasing minority populations. Table 3D shows the mix of races/ethnicities within the City.

In 2022 (ACS 5-year data), 2.4% of City of Mansfield residents were born outside of the United States, which is lower than the national average of 15.3%, and the State of Ohio average of 5.8%. In 2022, 0.8% of City of Mansfield residents were not US citizens. This compares with the national average of 6.5%, and the State average of 2.2%.

Table 3D: Race/Ethnicity alone or in combination with one or more other races as a percentage of the total population in the City of Mansfield

| | |
|--|-------|
| White alone | 70.0% |
| Black or African American alone | 19.4% |
| American Indian and Alaska Native alone | 0.1% |
| Asian alone | 0.9% |
| Native Hawaiian and other Pacific Islander alone | 0.3% |
| Some other race alone | 1.2% |
| Two or more races | 7.9% |
| Hispanic or Latino (of any race) | 2.9% |

Data source: 2022 ACS

In the Consolidated Plan, we used four HUD identified problems as potential sources of disparity. We looked at substandard housing, lacking complete plumbing or kitchen facilities, overcrowding, housing cost burden, and absence of income. We compared racial groups, by income category on whether or not they had these particular problems, and then looked for disparities.

As shown in Table 3E, there are three different racial groups that are disproportionately impacted by one or more of the four housing problems at various income points, with the Asian and Hispanic populations being more impacted in the 0-30% and 30-50% am-

Table 1: Housing Problems by Income, Race, and Ethnicity (2013-2017 CHAS)

categories, and the Black/African American population more impacted in the 50-80% and 80-100% amr categories. We also found that the Asian and Hispanic populations were more likely to have one or more severe housing problems.

In terms of the housing problems identified, housing cost burden is the most prevalent. According to the 2013-2017 CHAS data, a total of 3,989 renters and 1,563 homeowners pay more than 30% of their income on housing costs. Using 2022 ACS data, 49.1% of total renter households and 24.9% of total owner households pay over 30% of their income on housing. In addition, 1,225 renters and 498 homeowners are severely housing cost burdened, with over 50% of their income going to housing costs. However, this is not a problem that is isolated to the City of Mansfield. These high cost burdens are representative of what is occurring across the United States. The difference in Mansfield is that the median gross rents (\$733) and median housing values of owner occupied units (\$97,300) are already much lower than the national average, and are still not affordable to a large segment of the population. This makes it even more difficult to provide housing at a low enough price point to make it affordable to this group.

Of the other 3 housing problems identified in the CHAS tables, the lack of complete plumbing or kitchen facilities seems to be the next most significant problem. 205 renter households and 4 owner households experienced this problem. This is slightly higher than the State of Ohio and National averages, and is likely connected to the age of the housing stock in the City. Based upon data from the 2022 ACS, 78.5% of the housing stock was built prior to 1980. This compares to 64.6% for the State of Ohio. Over half of the City's current housing stock was built prior to 1960, and over a quarter of the housing was built prior to 1940. The age and obsolescence of this housing stock is one of the primary housing problems in the City. This issue also contributes to the general decline of some of the neighborhoods. Blight and vacancy are related concerns. 11.7% (2022 ACS) of the housing units are vacant, compared to a 8.8% average for the rest of the State. Removal of these blighting influences is also an important need, either through rehabilitation, or demolition. Mansfield has made some good progress with this in recent years. The percentage of vacant units was 18.2% in 2017.

Lack of adequate income also appears to contribute to the two problems above, and to be a significant problem in its own right. According to the 2022 ACS, the median household income in the City of Mansfield is \$40,996, which is much lower than the State of Ohio (\$56,990) and United States (\$74,580) median household income. 25.0% of the population of the City find themselves below the poverty level, compared with 13.3% for the State of Ohio. As identified in the tables above, 780 renter households and 95 owner households have no, or negative income.

Overcrowding is the last of the housing problems from the tables above, and appears to be minimal, though there are households experiencing overcrowding. 130 renter households

City of Maumee 2024-2029 Annual Action Plan | 2024-2029 Consolidated Plan

and 50 owner households have between 1.01 and 1.5 persons per room, and 40 renter households have more than 1.5 persons per room. About 13% of the population is experiencing this problem. This is slightly higher than State of Ohio statistics, and much lower than national statistics for this issue. There is likely a connection between overcrowding and lack of adequate household income.

Table 3E: Disparities by income, by racial group

| Race | One or more of 4 housing problems | | | | One or more of 4 severe housing problems | | | | Housing Cost Burdened | | | |
|--------------------------------|-----------------------------------|--------|--------|---------|--|--------|--------|---------|-----------------------|--------|----------|-----------|
| | 0-30% | 30-50% | 50-80% | 80-100% | 0-30% | 30-50% | 50-80% | 80-100% | 0-30% | 30-50% | Over 50% | No income |
| White | | | | | | | | | | | | |
| Black/African American | | | X | X | | | | | | | | |
| Asian | X | | | | | X | | | | | | |
| American Indian, Alaska Native | | | | | | | | | | | | |
| Pacific Islander | | | | | | | | | | | | |
| Hispanic | X* | | | | X* | X | X | | | | | |

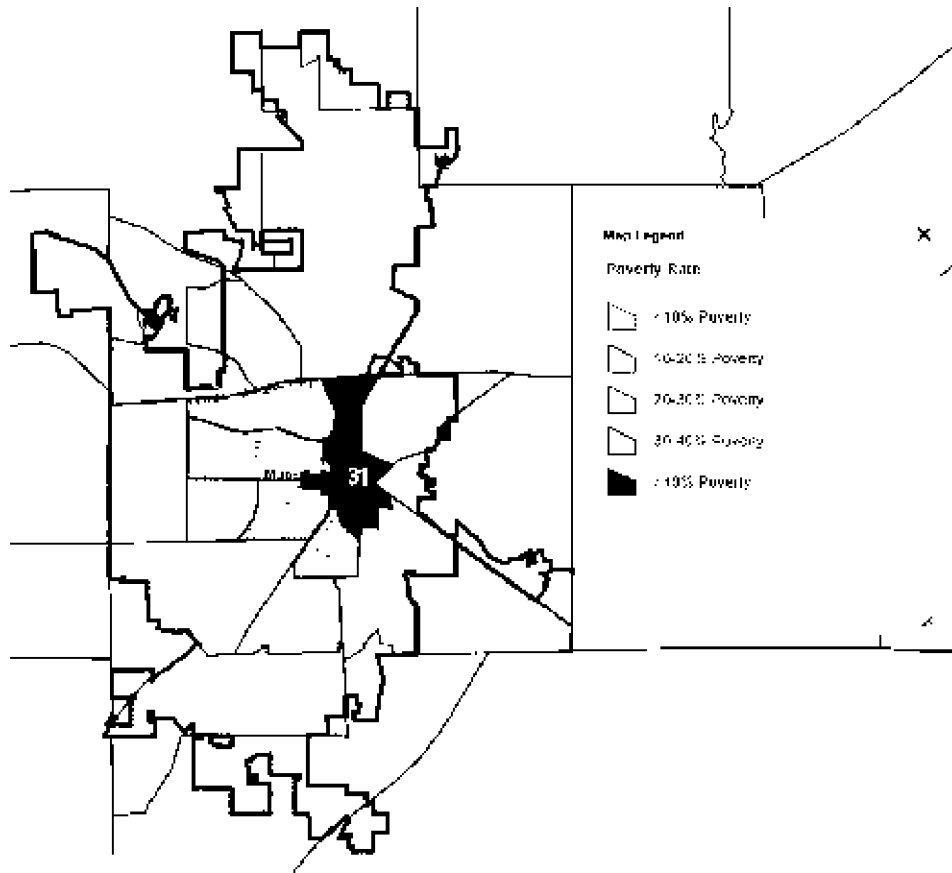
Data source: 2013-2017 CHAS, as used in the 2024-2029 City of Maumee Consolidated Plan

No. of negative income (the second X is really a double count of the problem of no or negative income already identified for this group)

Race also has a geographic component, which may lead to disparities, which we will explore further in the section on segregation/concentration of minorities

Concentrated Areas of Poverty

Map 3B: Poverty rates by census tract in the City of Mansfield



Data source: CPD Maps

Map 3B shows the poverty rate across the City by census tract. The areas where there are the lowest incomes and highest poverty levels are the area the City center (census tract 31), shown in dark purple, and to the west of this area (census tracts 4, 5, 6, and 7) shown in light purple. These areas of highest poverty are shown by an orange arrow on the map.

In 2022, median income in the City of Mansfield increased to \$40,996, a 36% increase from the year 2000. However, the consumer price index shows that inflation decreased the value of the dollar in the US by 70% over the same period, demonstrating that household incomes in the City have failed to keep pace with inflation. However, there has been improvement in this area as well. In the period from 2017 to 2022, the household median income increased

City of Middletown, Ohio – Annual Action Plan – 2025 – Page 92 of 117

by 20%, while the dollar value dropped 19%, with median income increases slightly outpacing inflation. Note that, despite these improvements, median household incomes for the City in 2022 (\$40,990) remain well below those for Richard county (\$56,557) and the State of Ohio (\$56,990).

Map 3C: Median Household Income, by Census Tract



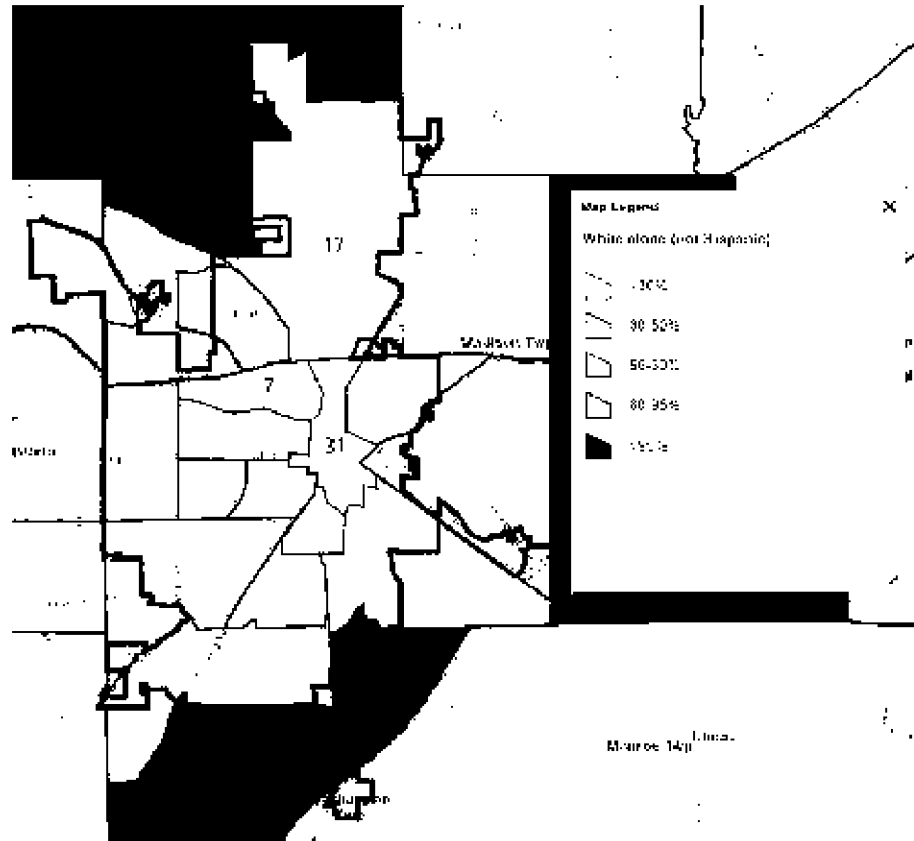
Data source: CRD Maps

Segregation/Concentration of Minorities

Maps 3D through 3J provide information on the geographic distribution of race/ethnicity across the City. On Map 3D, we can see that the percentage of the White, non-Hispanic population in census tracts 7, 17, and 31 are much lower than for the other areas of the City.

It is worth noting that very few people live in census tract 17, so we will not consider this census tract in the remaining discussion in this section.

Map 3D: Dispersion of the White (Alone, Non-Hispanic) Population Across the City of Mansfield



Data Source: HUD CPD Maps

Map 3E shows that the highest percentages of Black/African American alone population are found in the areas with the lowest White population (census tracts 7 and 31). From Table 3D, we can see that there is a very small (.2%) percentage of the population that is American Indian and Alaska Native alone, and on Map 3F that the highest concentrations are in census tract 15.

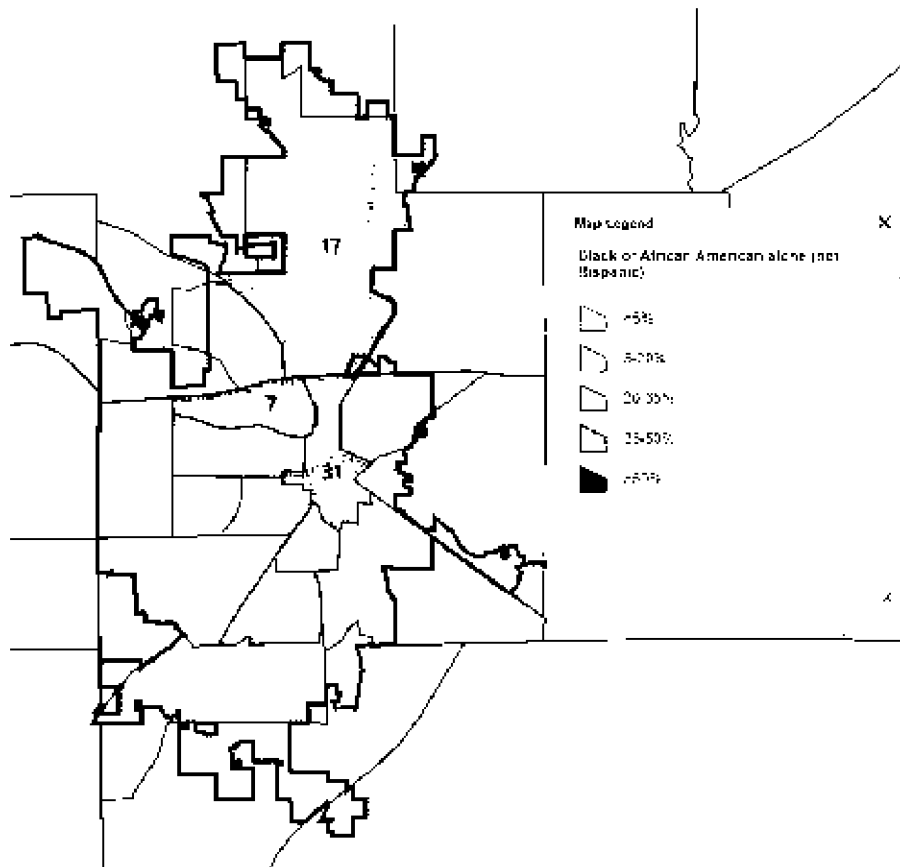
Fig. 3: Map 3C: Dispersion of the Asian (Non-Hispanic) Population Across the City of Mansfield.

On Map 3G, we see that the greatest concentration of the small Asian alone population (9%) are found in census tract 21.01, and on Map 3H, we see that the greatest concentration of the very small Native Hawaiian and other Pacific Islander alone population (3%) are found in census tract 13.

Pockets of concentration vary geographically for different racial or ethnic groups.

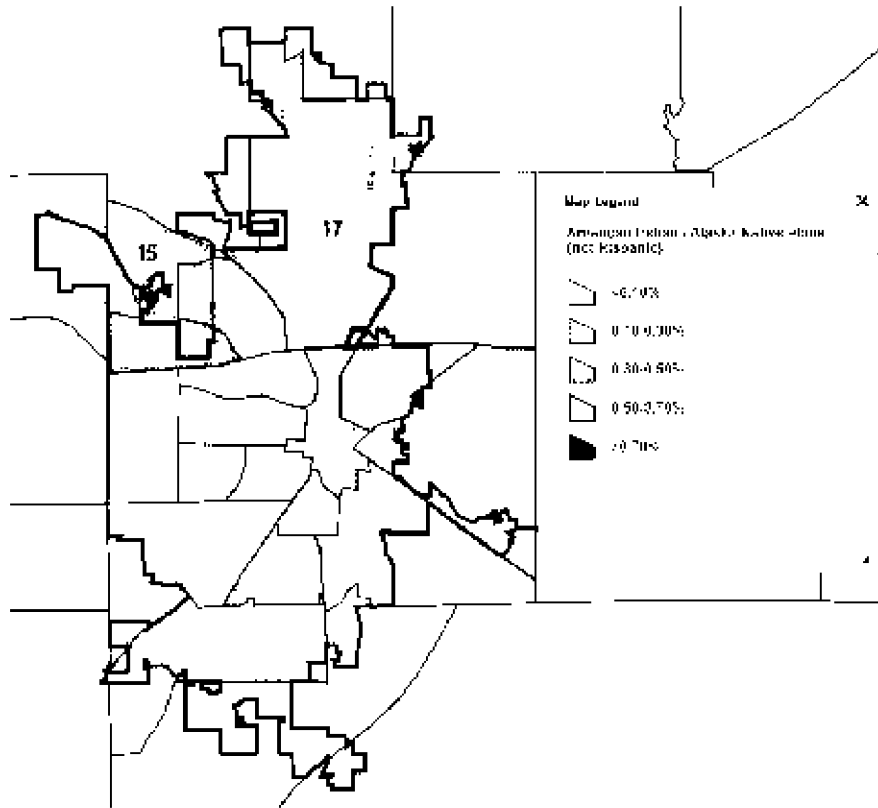
The greatest concentration of the small Population Identifying as Some Other Race (1.2%) are found in census tract 9 (Map 3I) and on Map 3J, we find that the greatest concentration of the Population identifying as Two or More Races (non hispanic) (7.9%) is in census tracts 7, 14, and 5.

Map 3E: Dispersion of the Black/African American (Alone, Non-Hispanic) Population Across the City of Mansfield.



Data Source: HUD CMB Maps

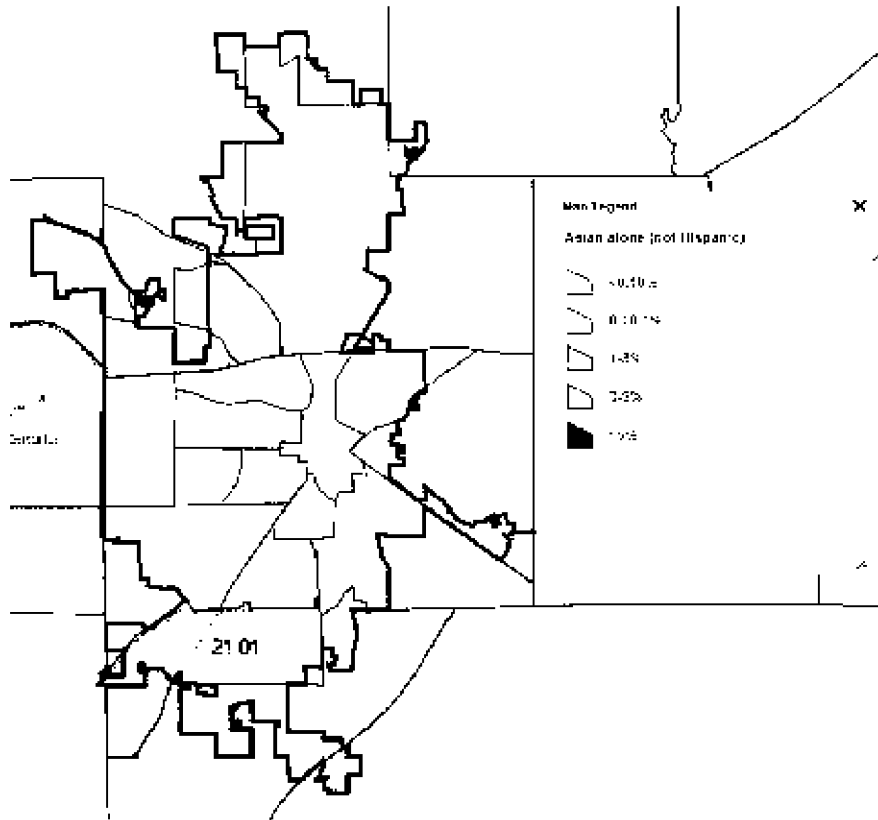
Map 3F: Dispersion of the American Indian/Alaska Native (Alone, Non-Hispanic) Population Across the City of Mansfield



Data Source: HUD CPO Maps

The small Hispanic or Latino (of any race) population (2.9%) is concentrated in census tracts 8, 16, and 31. As you can see, there are pockets of minorities in a variety of areas of the City. A review of this data demonstrates that some of the most impoverished areas of the City are also areas with high concentrations of minorities, as found in census tracts 31, 7, and 5 although there are also high poverty areas with low minority concentrations (4 and 6), and minority concentrations in non-minority areas (census tracts 6, 9, 13, 14, 15, 16, and 21.0). The areas where there are overlap between high minority concentrations and high poverty need additional consideration in addressing housing needs and equity within the City, though it must also be recognized that the poverty issue goes beyond these racial minority concentrated pockets.

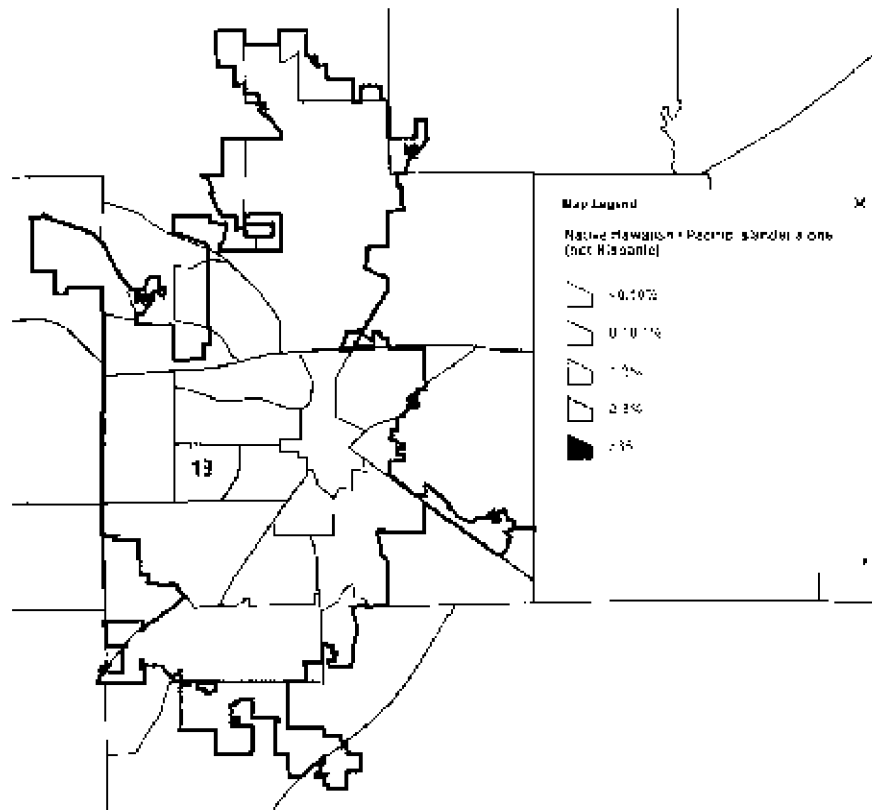
Map 3G: Dispersion of the Asian (Alone, Non-Hispanic) Population Across the City of Mansfield



Data Source: HUD CPD Maps

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion.

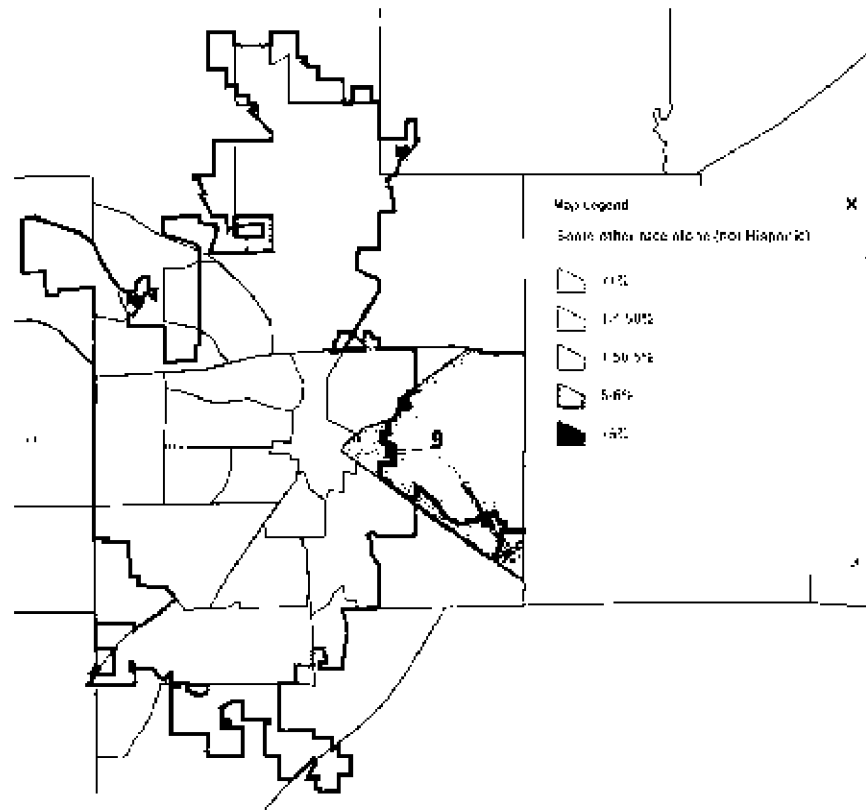
Map 3H: Dispersion of the Native Hawaiian/Pacific Islander (Alone, Non-Hispanic) Population Across the City of Mansfield



Data Source: HUD CPD Maps

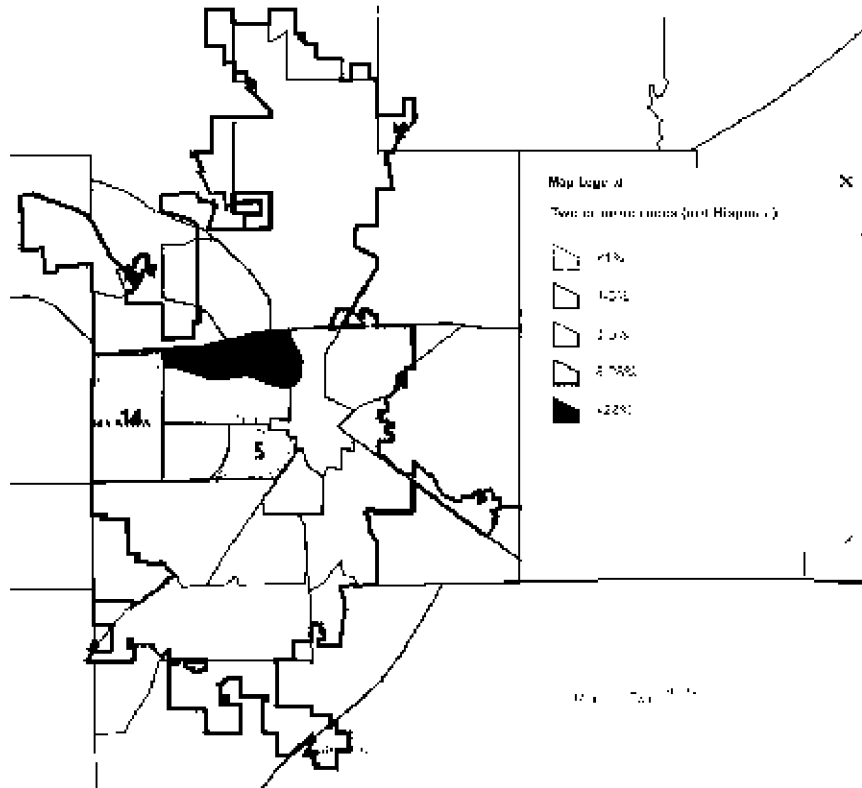
Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs. There are no census tracts in the City of Mansfield that meet this HUD definition, and are categorized as R/ECAPs.

Map 31: Dispersion of The Population Identifying as Some Other Race (alone, Non-Hispanic) in the City of Mansfield



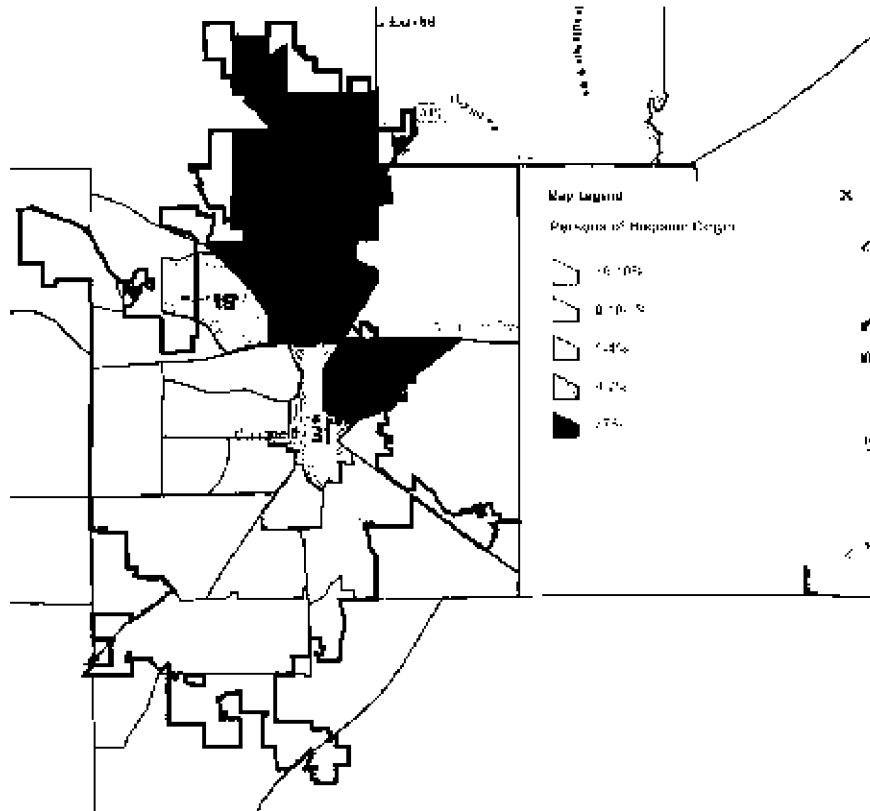
Data Source: HUD CPD Maps

Map 3J: Dispersion of the Population with Two or More Races (Alone, Non-Hispanic) Across the City of Mansfield



Data Source: HUD CPO Maps

Map 3K: Dispersion of the Hispanic Population Across the City of Mansfield



Data Source: HUD CPD Maps

Limited English Proficiency

Of the 45,000 people in the City of Mansfield that are 5 years and over, 43,105 speak English only. 1,894 people (4.2% of the total population five and over) speak a language other than English as their primary language at home. This compares with 21.7% for the US overall.

Of those in the City of Mansfield who speak a language other than English as their primary language at home, 689 (1.5% of the total population five and over) speak English less than very well (have

limited English proficiency). Of those with limited English proficiency, 689 (1.5% of the total population five and over) speak English less than very well (have limited English proficiency).

City of Mansfield, Ohio – Annual Action Plan – English Language Learners (ELL) and Limited English Proficiency

Limited English-speaking proficiency). This compares with 8.2% for the US overall. Table 3F breaks this down by language spoken.

Table 3F: Language spoken at home, and limited English-speaking households

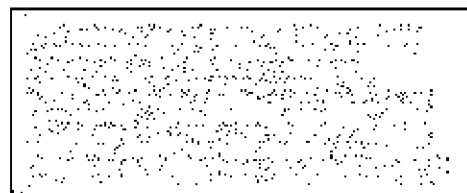
| | Number of persons* for whom this is their primary language spoken at home | Percentage of the Total persons* in the City of Mansfield who speak this as their primary language at home | Number of persons* who speak this language, and who have limited English speaking proficiency | Percentage of persons* in the City of Mansfield who speak this language, and have limited English speaking proficiency |
|------------------------------------|---|--|---|--|
| Spanish | 870 | 1.3% | 302 | 2.5% |
| Other Indo-European languages | 136 | 0.2% | 98 | 4% |
| Asian and Pacific Island languages | 25 | 0% | 92 | 2% |
| Other languages | 173 | 0.3% | 34 | 0.1% |

*Data source: 2022 ACS
persons aged 5 and over

Population with Disabilities

Of the total civilian noninstitutional population in the City of Mansfield, 8,760 people, or 20.8% have a disability. This compares with 12.8% for the US overall. Table 3G breaks this down for various population groups.

There is only a slight difference between the percentage of males and females that have disabilities, but the differences between those of various races is more pronounced. The



Black/African American population have the highest percentage of disability (29%), followed by the White population (21.2%). Conversely, the Asian, American Indian and Alaska Native, and Native Hawaiian and Other Pacific Islander populations all have a percentage of population with a disability in

the single digits. The biggest differences with regards to the percentage of a given population with one or more disabilities, not surprisingly, is with regard to age. The likelihood of having a disability increases significantly with age, particularly for those over the age of 65. At age 75 and over, nearly half of all people have one or more disability.

Table 3G: Number and percentage of various population groups with a disability

| Characteristic of population | Number in this category | Number with a disability | Percent with a disability |
|--|-------------------------|--------------------------|---------------------------|
| Total civilian noninstitutional population | 42,129 | 8,760 | 20.8% |
| Sex | | | |
| Male | 20,368 | 4,169 | 20.4% |
| Female | 21,741 | 4,591 | 21.1% |
| Race and Hispanic or Latino origin | | | |
| White alone | 30,774 | 6,516 | 21.2% |
| Black or African American alone | 7,025 | 1,753 | 25.0% |
| American Indian and Alaska Native alone | 24 | 2 | 8.3% |
| Asian alone | 430 | 29 | 6.7% |
| Native Hawaiian and Other Pacific Islander alone | 141 | 13 | 9.2% |
| Some other race alone | 991 | 60 | 11.7% |
| Two or more races | 3,341 | 387 | 11.6% |
| Hispanic or Latino (of any race) | 937 | 180 | 20.3% |
| Age | | | |
| Under 5 years | 2,630 | 0 | 0% |
| 5 to 17 years | 8,487 | 597 | 9.2% |
| 18 to 34 years | 9,854 | 1,270 | 12.9% |
| 35 to 64 years | 15,020 | 3,543 | 23.6% |
| 65 to 74 years | 4,737 | 1,767 | 36.8% |
| 75 years and over | 3,341 | 1,993 | 47.4% |

Data source: 2022 ACS 5-year estimates detailed tables

Table H breaks down disabilities by type of disability. The most common disabilities are ambulatory, followed by cognitive and independent living. Keep in mind that people may have more than one type of disability.

Table 3H: Number and percentage of the population with specific types of disability

| Disability type | Number | Percent |
|--------------------|--------|---------|
| Hearing | 1,806 | 4.3% |
| Vision | 1,907 | 4.5% |
| Cognitive | 3,815 | 9.7% |
| Ambulatory | 4,320 | 10.9% |
| Self-care | 2,839 | 4.8% |
| Independent living | 3,131 | 9.7% |

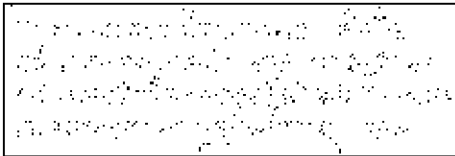
Data source: 2022 ACS 5-year estimates detailed tables

Chapter 4: Access to Opportunity

Overview of Access to Opportunity

In this chapter, we seek to look more closely at the population groups of racial minorities, national origin outside of the United States, and families with children, which have been identified as potentially being disadvantaged in a community. We want to understand more fully where concentrations of these groups exist, and what some of the limitations are to opportunity for these groups.

HUD has sought to measure things like poverty, school proficiency, transportation costs, and job proximity. For each factor that they seek to measure, they have created maps to show geographic dispersion, and have created an index that seeks to measure each factor. These indexes are meant to demonstrate opportunity across a geography on a scale of 0 to 100, with 0 being low, or no, opportunity, and 100 representing great opportunity for that factor.

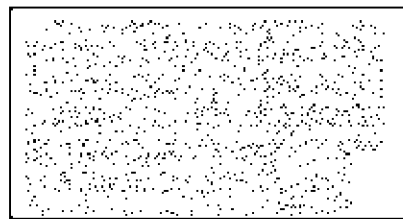


In chapter 3, we looked at a number of demographics, and discovered a correlation between concentrations of poverty and concentrations of minorities for some locations. A search of census tracts has been conducted, to find those that had both high poverty and high concentrations of minorities, those with non-US national origins, and/or families with children. These are shown in Table 4A.

For each indicator listed in Table 4A, we have indicated by increasingly dark cell shading those census tracts that are of the lowest potential for opportunity for that specific indicator. The Index totals are found in the bottom row.

For Table 4A, we are interested in census tracts that have low potential opportunity, and particularly for those that have both a poverty index of 20 or below, and one of the following:

- An overall concentration of racial minority groups above 25%;
- a concentration of one or more racial or ethnic minorities over 20%; or
- a concentration of families with children over 50%.



Where the percentage of a racial minority in any of the selected census tracts did not exceed 20%, we did not include that racial minority on the chart. We included the percentage of households who speak a language other than English in the home. Surprisingly there was no correlation between limited English proficiency and the percentages of

persons with national origins outside the United States.

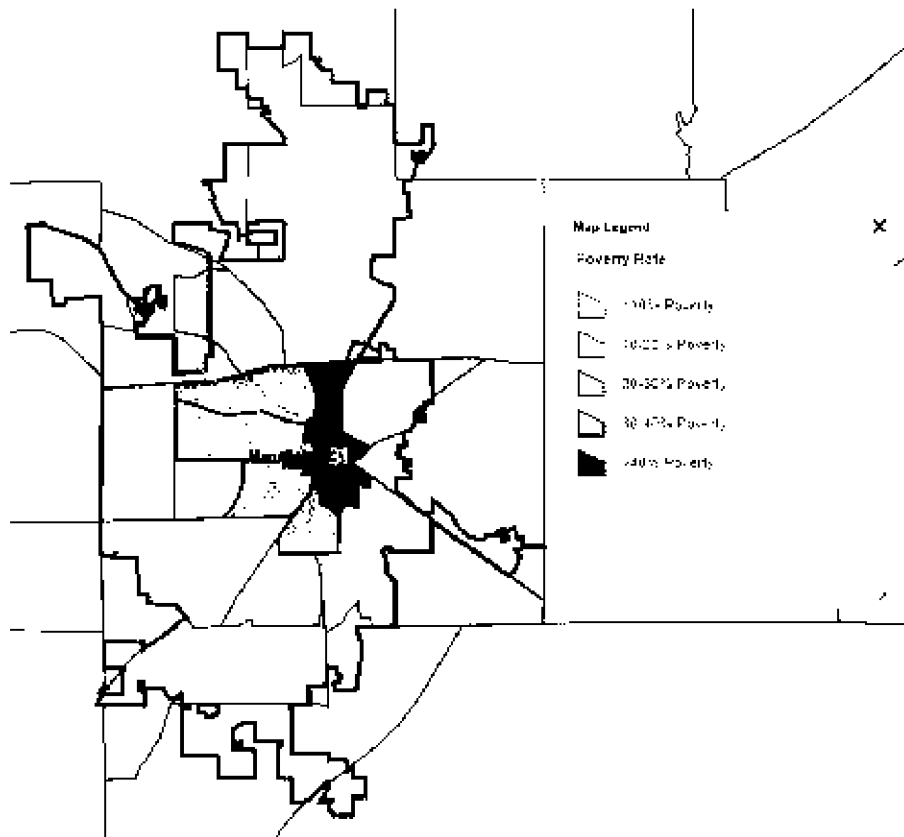
7.1.1 Map 4A: Areas of Poverty and High Minority Concentration

Census tracts that had a poverty index of 20 or below, and an overall concentration of racial minority groups above 25%, a concentration of one or more racial or ethnic minorities over 20%, or a concentration of families with children over 50% include the following:

- Census tract 4
- Census tract 5
- Census tract 6
- Census tract 7
- Census tract 31

Next, we want to look at each of the opportunity factors, and the associated indices, as we seek to understand where opportunity is lacking for population groups residing in each census tract. We will begin with the poverty index.

Map 4A: Areas of Poverty and High Minority Concentration



Data source: CPD Maps

Table 4A: Census Tracts with Concentrations of Minorities, Persons with non-US National Origins, and/or Families with Children, and opportunity indexes for each.

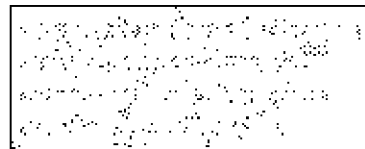
| | Census Tract 12 | Census Tract 2101 | Census Tract 2102 ¹ | Census Tract 11 | Census Tract 13 | Census Tract 10 ² | Census Tract 14 | Census Tract 16 | Census Tract 8 ³ | Census Tract 15 ⁴ | Census Tract 8 | Census Tract 4 | Census Tract 7 | Census Tract 17 ⁵ | Census Tract 5 | Census Tract 31 | Census Tract 6 |
|--|-----------------|-------------------|--------------------------------|-----------------|-----------------|------------------------------|-----------------|-----------------|-----------------------------|------------------------------|----------------|----------------|----------------|------------------------------|----------------|-----------------|----------------|
| White | 89% | 90% | 92% | 89% | 84% | 82% | 79% | 90% | 93% | 94% | 82% | 76% | 83% | 41% | 65% | 60% | 54% |
| Black/African American | 7% | 5% | 1% | 8% | 11% | 13% | 15% | 6% | 1% | 2% | 12% | ... | ... | ... | ... | ... | ... |
| Hispanic ⁶ | 2% | 2% | 1% | 1% | 2% | 2% | 2% | 2% | 0% | 2% | 2% | ... | ... | 8% | ... | ... | ... |
| Two or more races | 2% | 2% | 2% | 4% | 3% | 4% | 2% | 2% | 2% | 1% | 3% | ... | ... | 0% | ... | ... | ... |
| National Origin ⁷ | 1% | 3% | 1% | 1% | 0% | 1% | 1% | 1% | 0% | 2% | 1% | ... | ... | 0% | ... | ... | ... |
| Limited English Proficiency ⁸ | 5% | 0% | 0% | 3% | 4% | 4% | 16% | 18% | 0% | 0% | 4% | 3% | 0% | 12% | 0% | 19% | 0% |
| Families with Children | 55% | 57% | 38% | 39% | 45% | 40% | 36% | 38% | 44% | 32% | 45% | ... | 49% | 28% | ... | 49% | 45% |
| Poverty Index | 45 | 68 | 89 | 60 | 41 | ... | 26 | ... | 20 | 13 | ... | 10 | ... | 82 | 10 | ... | ... |
| School Proficiency Index | 36 | 37 | 33 | 31 | 47 | 33 | 39 | 38 | ... | 49 | 49 | 35 | 58 | 36 | 33 | 32 | 38 |
| Transportation – Transit Index | 25 | 18 | ... | 26 | 41 | 13 | 20 | 25 | 17 | 21 | 32 | 15 | 40 | 12 | 39 | 38 | 41 |
| Low Transportation Costs Index | 19 | 23 | 11 | 25 | 23 | 25 | 45 | 18 | 15 | 22 | 21 | 27 | 36 | ... | 30 | 28 | 27 |
| Job Proximity Index | 65 | 53 | ... | 65 | 73 | 51 | 82 | 67 | ... | 94 | 73 | 68 | 68 | 56 | 75 | 63 | 64 |
| Labor Market Index | 70 | 39 | 77 | 43 | 49 | 34 | 29 | ... | 28 | ... | 12 | ... | ... | ... | 19 | ... | ... |
| Environmental Health Index | 80 | 84 | 65 | 61 | 76 | 79 | 80 | 76 | 80 | 80 | 78 | 75 | 77 | 76 | 65 | 75 | 79 |
| Average Index Score: | 49 | 46 | 48 | 48 | 50 | 39 | 46 | 40 | ... | 41 | 39 | 40 | 42 | 44 | 39 | 39 | 42 |

Data Source: 2020 ACS 5-year Estimates, detailed tables and HUD's Affirmatively Furthering Fair Housing Tool
 Census Tracts 9, 21, 22, 10, and 15 contain significant area outside of the Mansfield City limits.
 Census Tract 17 has few residents.

Poverty

In Table 4A we seek to correlate areas of high poverty and high concentrations of populations that are potentially at risk for facing risks of impediments to opportunity. Poverty is perhaps the biggest risk for any population in accessing those things that can bring quality of life. A lack of financial means limits a household's access to everything from healthcare, to good nutrition, to decent housing. What we find is that minorities and other vulnerable populations live in areas with high poverty. However, to put this into perspective, much of the City of Mansfield lives in high poverty areas. 30 of the 17 census tracts that make up the City of Mansfield have a poverty index of 20 or below. This includes areas with high minority concentrations, but also areas with high white concentrations.

An important question to address is what limits a household's access to adequate income. There can be multiple factors. Some of those factors are related to inherited or acquired characteristics of the members of the household, some are based upon choice, and others are based upon the environment of members of that household over time. We will look at some of those environmental or opportunity factors in the next few pages, as we seek to better understand and improve opportunity for those who lack it.



Education

Educational opportunities are important to success in getting a good job, and to earning a good income. In chapter 3 we discuss the importance of education, and compare income based upon educational attainment, by sex, for the City of Mansfield in Table 3A. It is clear from this table that there is a correlation between the amount of education that one obtains, and the amount of income that they earn. Another important construct is the quality of education. Put another way, good schools matter.



HUD has developed a school proficiency index, which we used in Table 4A. This school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe

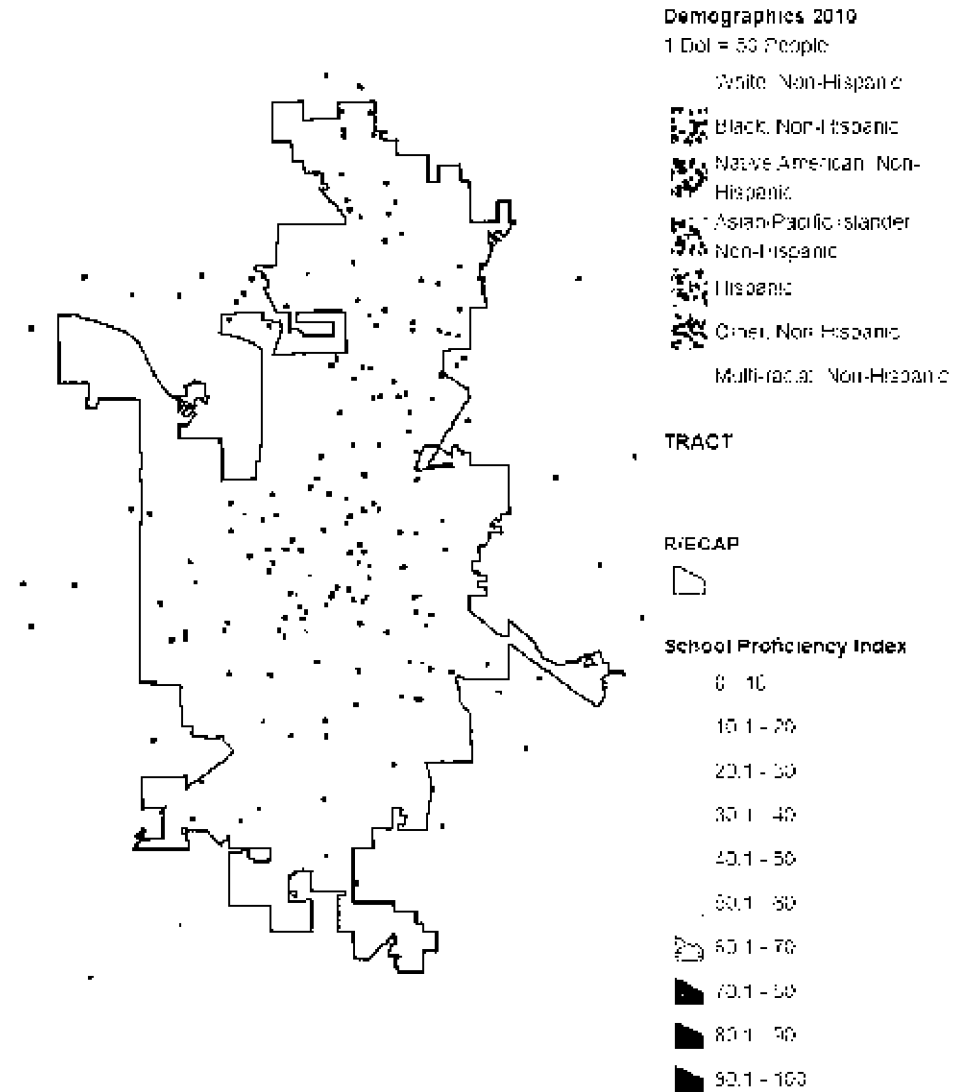
which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools.

The school proficiency index is a function of the percent of 4th grade students proficient in reading and math on state test scores for up to three schools within 1.5 miles of the center of the census tract. Map 4B shows the ranges for the index scores for each census tract in the City of Mansfield. Higher scores indicate test higher scores on reading and math, suggesting better schools. One of the 17 census tracts that we studied in Table 4A had school proficiency index scores below 30. This is not a high minority census tract. However, three of the high minority concentration areas had scores at or below 35. This highlights the need

7.1.1 Map 4B: School Proficiency Index (SPI) by Tract, 2019

to continue to focus on education as an element that needs addressed across the community, and particularly in the areas of high minority concentration.

Map 4B: School Proficiency Index



Data source: HUD Enterprise Geospatial Information System (eGIS)

City of Mansfield Strategic Plan: Annual Action Plan 2025, Opportunity Index, and Community Profile

Keep in mind that low test scores can result from a variety of factors. The physical and mental health of the individual taking the test, the quality of instruction, the assistance of other members of the household in preparing the student for scholastic success, the student's nutrition, and the distraction of the student by other environmental challenges are all examples that can come into play. Improvements in any one of a variety of factors could help to raise these test scores.

Educational attainment is as low as compared with the State of Ohio (see Table 4B).

Table 4B: Educational Attainment

| Educational Attainment for Population 25 and over | City of Mansfield | State of Ohio |
|--|--------------------------|----------------------|
| Percent high school graduate or higher | 86.9% | 91.4% |
| Percent bachelor's degree or higher | 15.9% | 30.4% |
| Percent with graduate or professional degree | 5.6% | 11.7% |

Transportation

Transportation is tied to opportunity both because it is important in accessing good jobs, but also because it can help households to access other life-enriching products and activities. For example, access to good food and healthcare can make it possible to be in better health, leading to improved work and school performance.

HUD looked at transportation in two different ways in preparing their opportunity indexes. The first is through the transit trip index. This index is based on estimates of transit trips taken by a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region.

Values are percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the more likely residents in that neighborhood utilize public transit. The index controls for income such that a higher index value will often reflect better access to public transit.

The second way that HUD measures transportation is with the Low Transportation Cost Index. This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region.

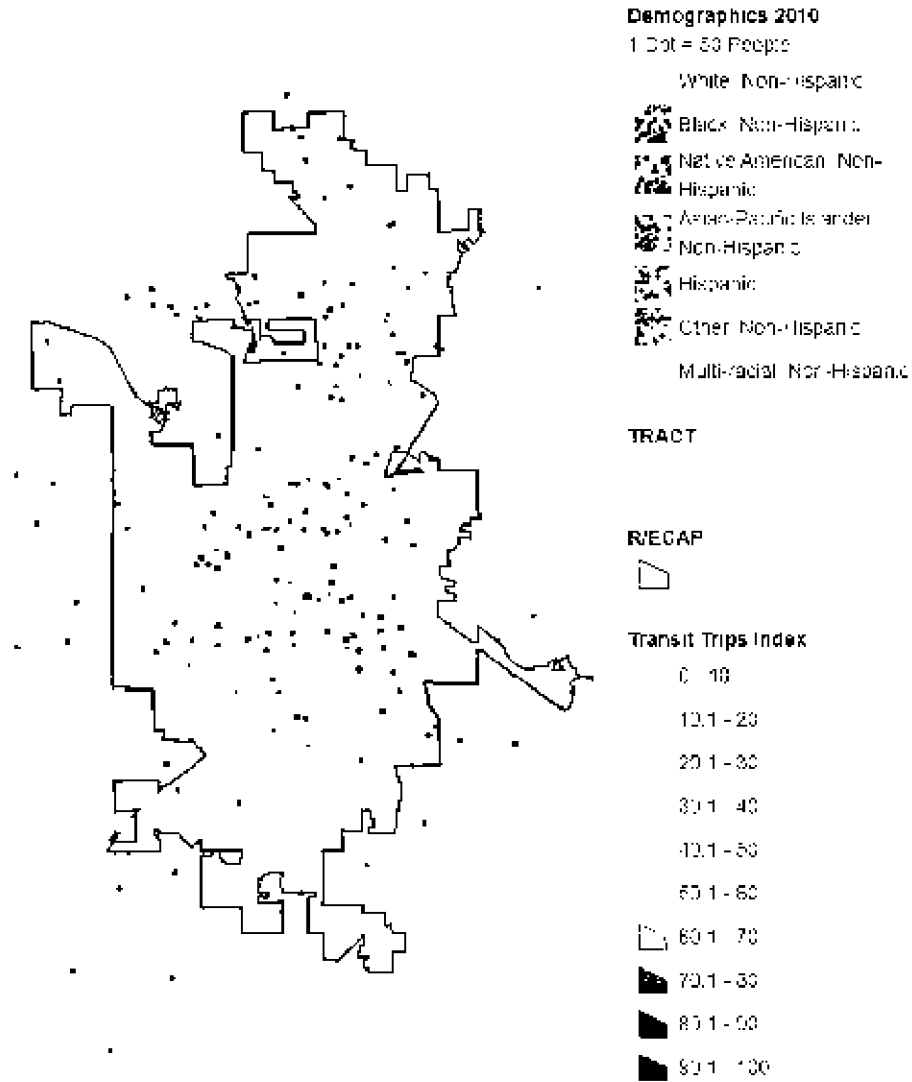
Values are inverted and percentile ranked nationally, with values ranging from 0 to 100. The higher the value, the lower the cost of transportation in that neighborhood. Transportation costs may be low for a variety of reasons, including greater access to public transportation and the density of homes, services, and jobs in the neighborhood and surrounding community.

Transportation has been identified as a challenge for some in the City, and the overall scores were below average. The overall average score across all census tracts in the City were 79

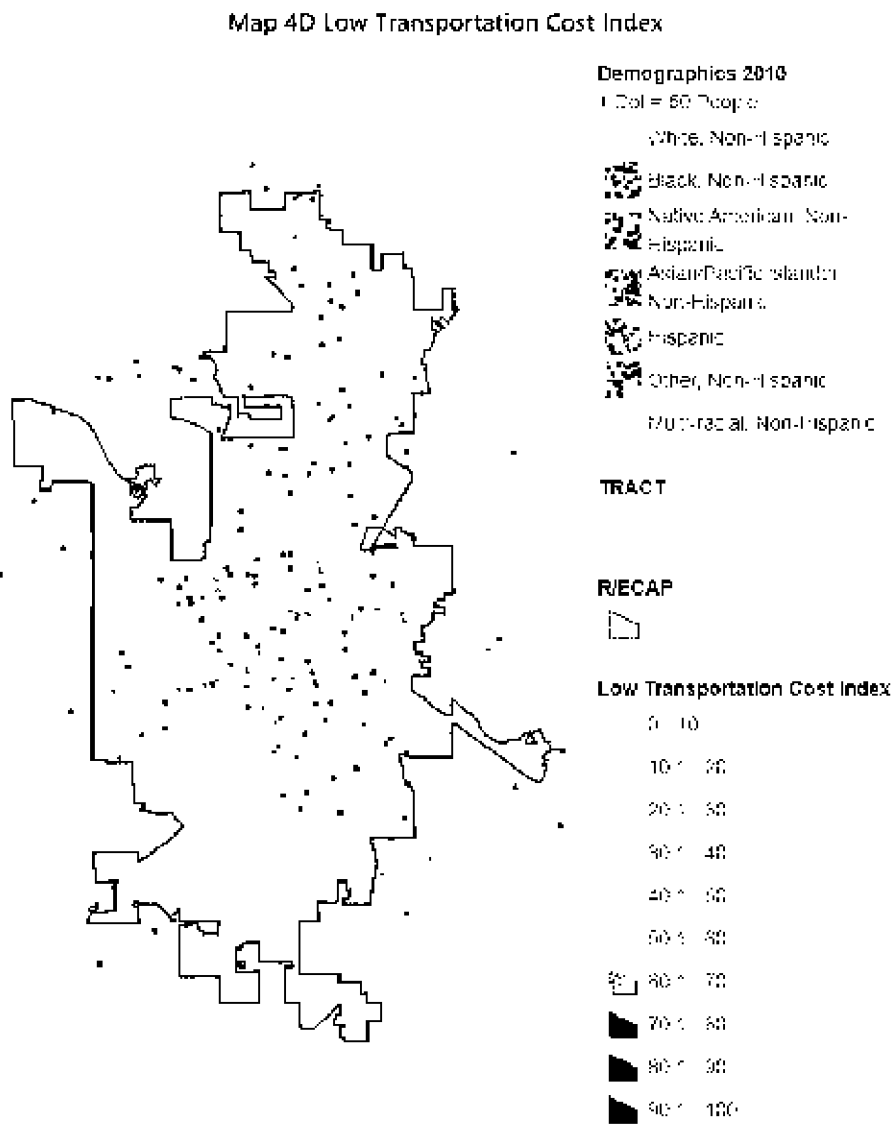
Map 4C: Transit Trips Index

for the transit trip index, and 22.6 for the low transportation cost index. This shows a need for improvements in transportation in general Citywide. However, the scores for the high minority concentration census tracts were not low on either of these indices in comparison with the rest of the City. The average score across all high minority concentration census

Map 4C: Transit Trips Index



Data source: HUD Enterprise Geospatial Information System (eGIS)



Data source: HUD Enterprise Geospatial Information System (eGIS)

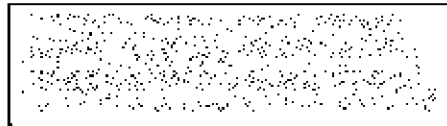
Tracts with persistent poverty in the City were 42.6 for the transit trip index, and 29.6 for the low transportation cost index. Transportation does not appear to be a major factor in limiting opportunity in comparison to the rest of the City for those in these areas of concentration.

Employment

Employment is connected to opportunity for obvious reasons, many of which we already discussed in the section on poverty. In turn, access to good jobs may be limited by other factors. HUD measures employment opportunity in two ways. The first is through the Jobs Proximity Index.

The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a core-based statistical area (CBSA), with larger employment centers weighted more heavily. Specifically, a gravity model is used, where the accessibility of a given residential census tract is a summary description of the distance to all job locations, with the distance from any single job location positively weighted by the size of employment (job opportunities) at that location and inversely weighted by the labor supply (competition) to that location. Values are percentile ranked with values ranging from 0 to 100. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

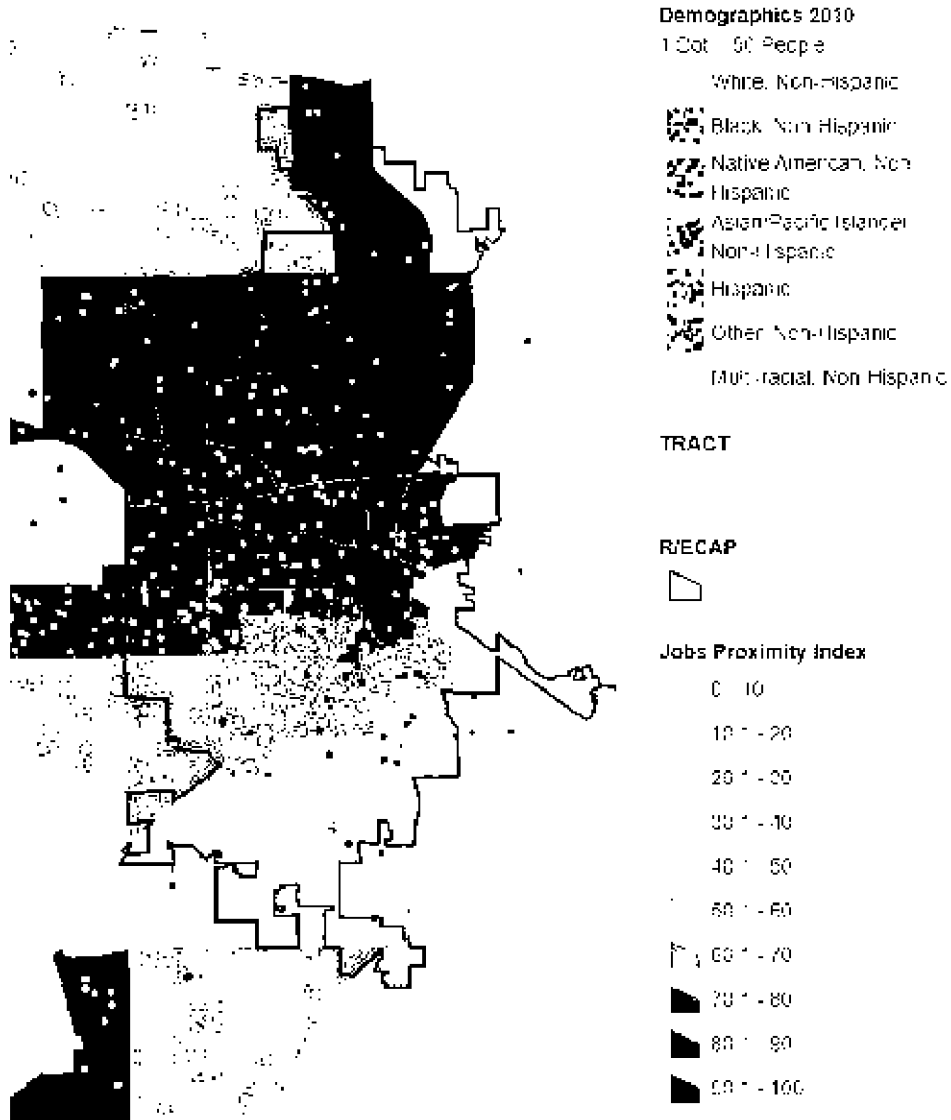
The second way that HUD measures employment opportunity is through the Labor Market Engagement Index. The labor market engagement index provides a summary description of the relative intensity of labor



market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. Formally, the labor market index is a linear combination of three standardized vectors: unemployment rate, labor-force participation rate, and percent with a bachelor's degree or higher. Values are percentile ranked nationally and range from 0 to 100. The higher the score, the higher the labor force participation and human capital in a neighborhood.

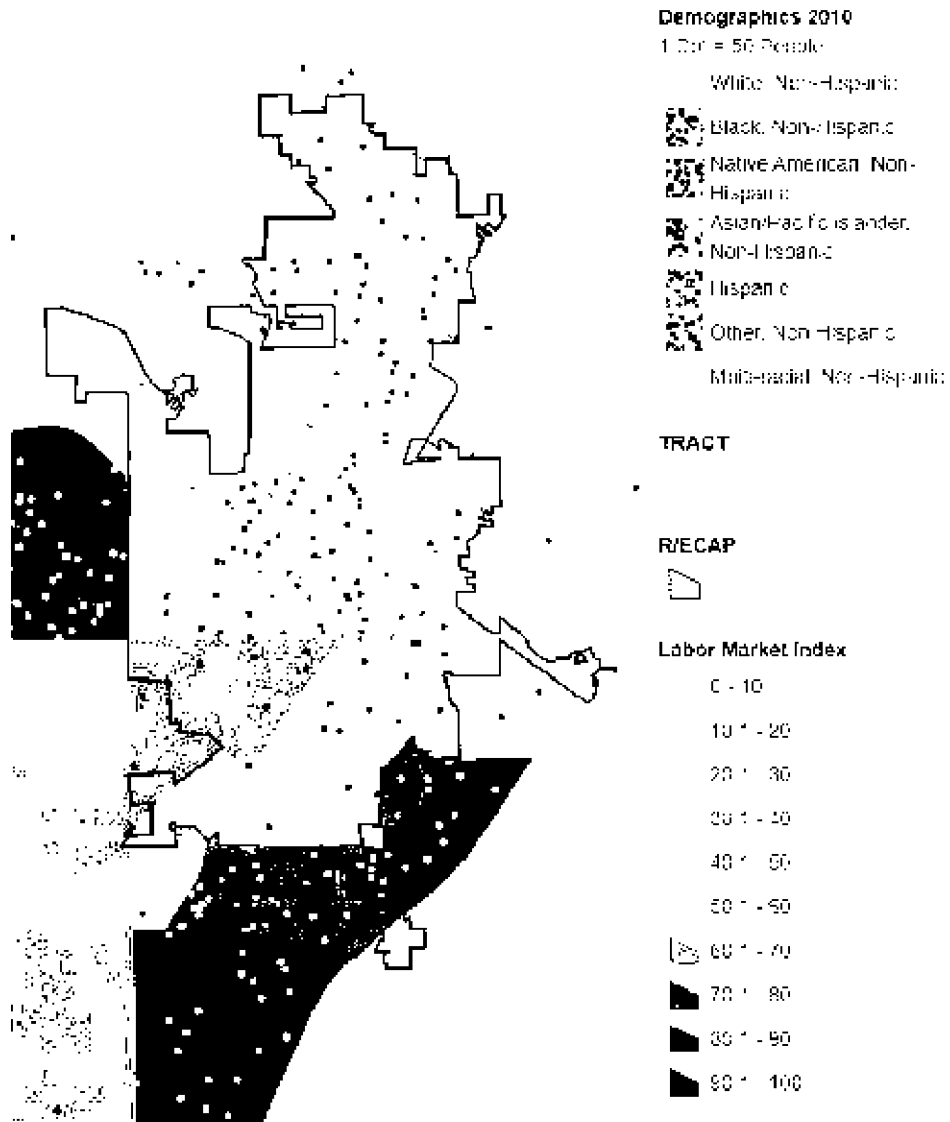
These indices demonstrate that good employment opportunities are potentially a significant factor for many of the households living in these areas of concentrated poverty and concentrations of protected classes. As shown in Table 4A, for the Job Proximity Index, two of the 17 census tracts had index scores below 40 (each scored 39). The top Proximity scores indicate overall average access to employment opportunity, and high minority concentration areas had better than average employment opportunity, so that does not appear to be a factor. The Labor Market Engagement Index, on the other hand, had much lower scores, with 11 of the census tracts scoring less than 30, and seven of them scoring less than 10. The overall average score across all census tracts in the City was 25.1, and the average score across high minority concentration, high poverty areas was 6.8. There was clearly a correlation between the lack of market engagement and the high minority concentration areas. This indicates that people in these neighborhoods of concentration are quite disengaged from the workforce. Much needs to be done to both re-engage this population in meaningful employment, and to improve market engagement City wide.

Map 4E: Jobs Proximity Index



Data source: HUD Enterprise Geospatial Information System (EGIS)

Map 4F: Labor Market Engagement Index



Data source: HUD Enterprise Geospatial Information System (EGIS)

Environmental Health

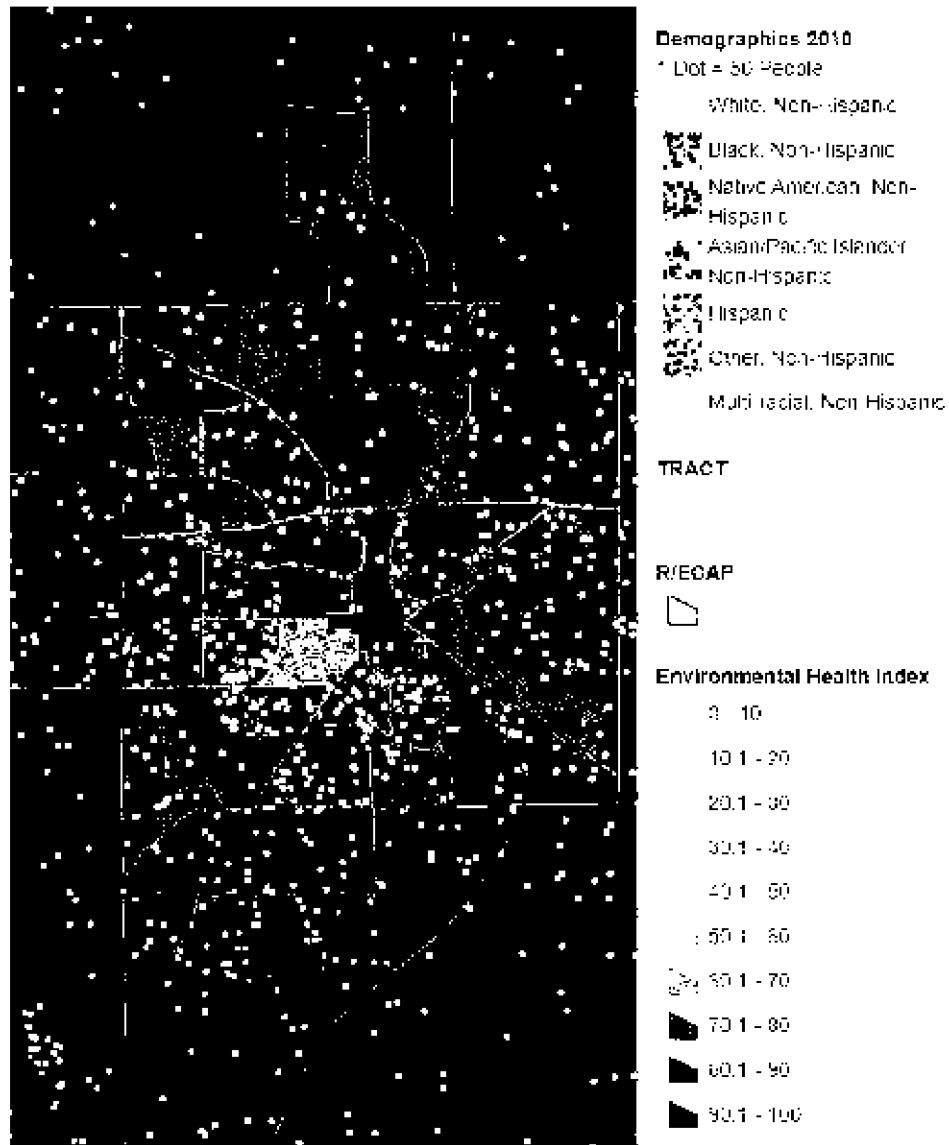


Environmental health is the last of the ELD factors that we assessed, as shown in Table 4A. The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality, carcinogenic, respiratory, and neurological hazards. Values are inverted and then percentile ranked nationally. Values range from 0 to 100. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census tract.

Based on the indices for environmental health found in each of the census tract where concentrations of protected classes and poverty are found, environmental health is not a potential limiting factor to opportunity. None of the census tracts were found to have environmental health concerns, and all scored 65 or above.

Environmental factors can lead to poor health and to learning difficulties. As an example, lead-based paint has been linked to poor cognitive function and challenges with school performance.

Map 4G: Environmental Health Index

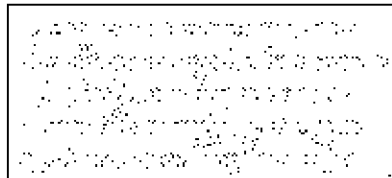


Data source: HUD Enterprise Geospatial Information System (eGIS)

Summary

In Table 4A, we averaged the index scores as a way to compare census tracts, with regards to the overall impact of the combined indices. The census tracts had average index scores which ranged from a low of 33 to a high of 50. The census tracts with areas of high minority concentration had average index scores which ranged from a low of 39 to a high of 47. The overall average score across all census tracts in the City was 42.6, and the average score across high minority concentration census tracts was 40.4. This is only marginally lower than the overall average.

Perhaps even more important than pinpointing the exact areas where opportunities are most limited, is identifying the types of limitations on opportunity. Poverty is a given as a limiting factor on opportunity. The overall average poverty index across all census tracts in the City was 29.2, which indicates a need for improvements in the economy overall.



The average poverty index score for high minority concentration census tracts was 5.8. There is a clear correlation between poverty and areas with a high minority concentration.

The following factors will help us to answer the question of why households are facing poverty. Based upon our analysis, the following factors appear to be the most limiting to opportunity of those measured for persons residing within the majority of these concentrated census tracts:

- Education, as measured by test scores (average score by high minority concentration census tract = 43.8, and average score across the City's census tracts = 42.3)
- Transportation appears to be an issue City wide. The transit trip index score average across all census tracts in the City was 29.0 (42.6 for high minority concentration/high poverty census tracts), and the low transportation cost index was 22.6 (29.6 for high minority concentration/high poverty census tracts)
- Labor market engagement scores (average score by high minority concentration census tract = 6.8, and average score across all of the City's census tracts = 75.7)

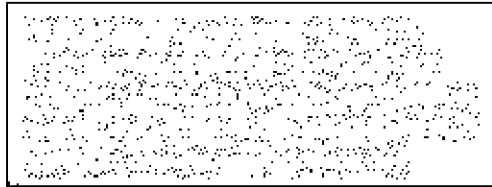
Based upon the average scores across all seventeen of the City's census tracts, labor market engagement appears to be the most limiting factor to opportunity. This raises the question, why are these communities not more fully engaged in the workforce? More research needs to be done to better understand and address this issue. Possible related factors may include the following:

- A lack of education or adequate job training. We know that educational attainment is low in the City (see Table 4B). It could also be that there is a mismatch between available jobs, and the type of education held. For example, one of the areas largest employers is a hospital. Medical personnel often require specialized degrees that may not be held by those without jobs.

7.1.11 Transportation Services and Access to Employment, Education, and Training

- A lack of childcare services
- A high concentration of persons with disabilities. We found in chapter 3 that the overall percentage of persons with disabilities is high for this area (20.8%, compared with an average of 14.1% for the State of Ohio). The Black/African American population had even levels of disability than the general population (25.0%), as did women (21.1%) and those over the age of 65 (36.8% for those aged 65 to 74 and 47.4% for those 75 years and over)

Housing can, to a degree, also be a limiting factor related to workforce engagement. Without a safe, comfortable, healthy environment in which to live, it is more difficult to take the steps necessary to get the required education, seek and secure a good job, and get to work each day.



Based upon the average scores across all seventeen of our census tracts, transportation appears to be the second

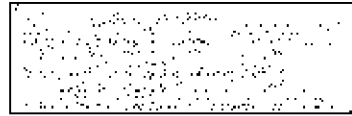
most limiting factor to opportunity. This factor has obvious and direct links to maintaining employment. We have also discovered that available public transportation has limited hours of availability, which may not make it possible to hold jobs that have shifts outside of this timeframe.

Chapter 5: Housing Profile

Housing Supply

There is a significant need for improvements to the housing stock in the City of Mansfield. The housing stock is old in comparison to the average for the State of Ohio. Of the 21,399 housing units in the City, 5,430 of them (25.3%) were built prior to 1940. This compares with 19.3% for the State of Ohio. 16,791 of the housing units (79.5%) were built prior to 1990. As these older houses continue to age, their condition becomes a potential issue. The maintenance of these houses varies, with many of the properties needing repairs. Many of these homes are also in need of major system updates, as original wiring, HVAC systems, windows, and plumbing are all beyond their useful life.

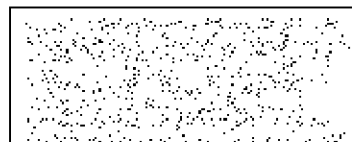
Typically, as houses age, the useful lives of many of the systems such as plumbing, electrical, HVAC, and building envelopes (windows, roofs, etc.) are taxed. This is partly because of a breakdown in the materials from which the



systems were made. For example, the galvanized pipes placed in service 60 years ago are likely beyond their expected lifespan. Sun, water, friction, age, and other factors all impact housing systems over time. It is also partly a problem of how differently modern houses are used from when they were originally built. Think, for example, about how much more electricity we use today, compared to 1960. There were no computers, cell phones, dishwashers, microwaves, etc. to tax the electrical systems. In addition, a failure to maintain homes can also be a problem, as one problem can lead to other problems. For example, a leaking roof can cause water damage within the structure, and can attract pests such as termites. These housing problems can lead to safety and environmental health hazards such as electrical shorts, inadequate heat, drafty rooms, sewer gases or natural gas leaks.

11.7% of all houses in the City of Mansfield are vacant. 80% of survey respondents identified vacant buildings as a significant problem in the City affecting the marketability of housing in the City.

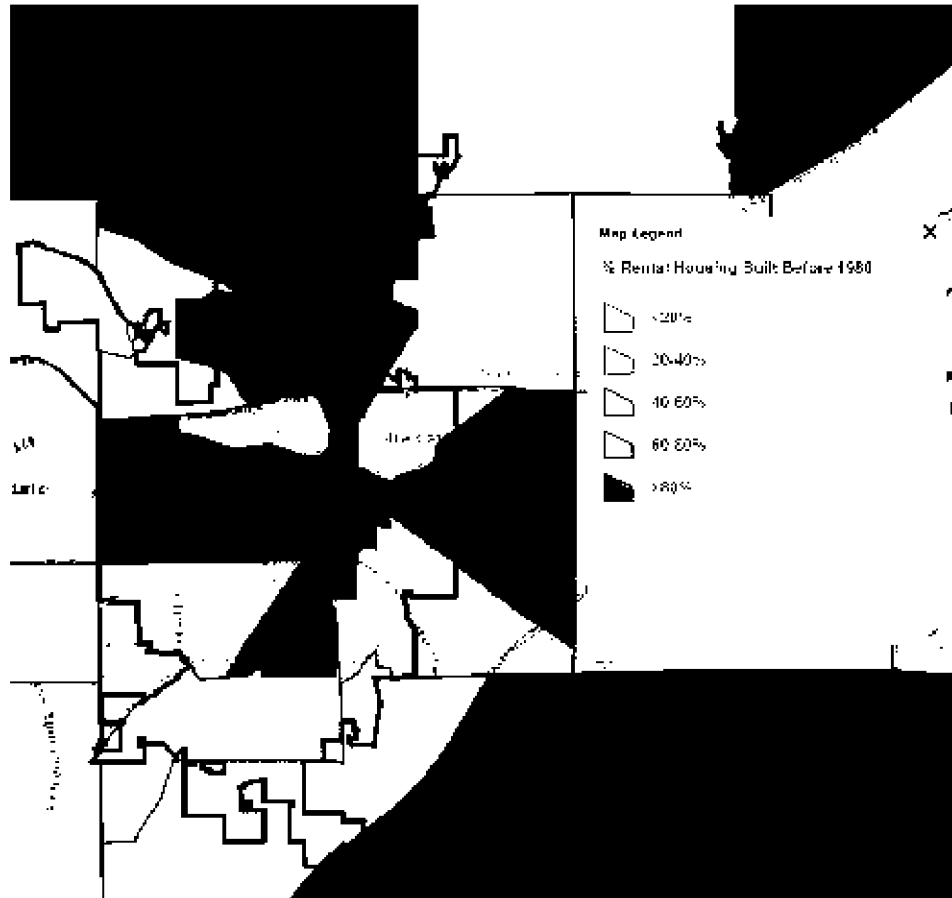
The improved quality of housing for sale scored the highest of all housing needs in the public survey, followed by improved quality of rental housing, improved housing affordability, assistance to homeless, and fair housing. In the stakeholder survey the



improved quality of rental housing was the highest scoring housing need. Better housing affordability, a need for the improvement in the quality of housing for sale, and a shortage of both rental housing and housing for sale also scored as high needs.

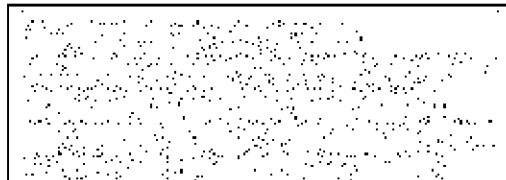
Building code enforcement, a housing standard for landlords, and an investment in funding that improves homes were the top housing priorities in the public meeting setting of planning priorities.

Map 5A: Percentage of Rental housing built before 1980, by census tract



Data source: CAD Maps

The data identified some households that lacked complete plumbing (0.2%) and/or kitchen (1.4%) facilities. We heard repeatedly from stakeholders in our interviews with them that there is not enough decent quality housing that is safe and well maintained.



The need for improvements to the housing stock is directly connected with another important need, which is the removal of blighted housing. Not all housing is worth saving, and the blighted housing brings down surrounding

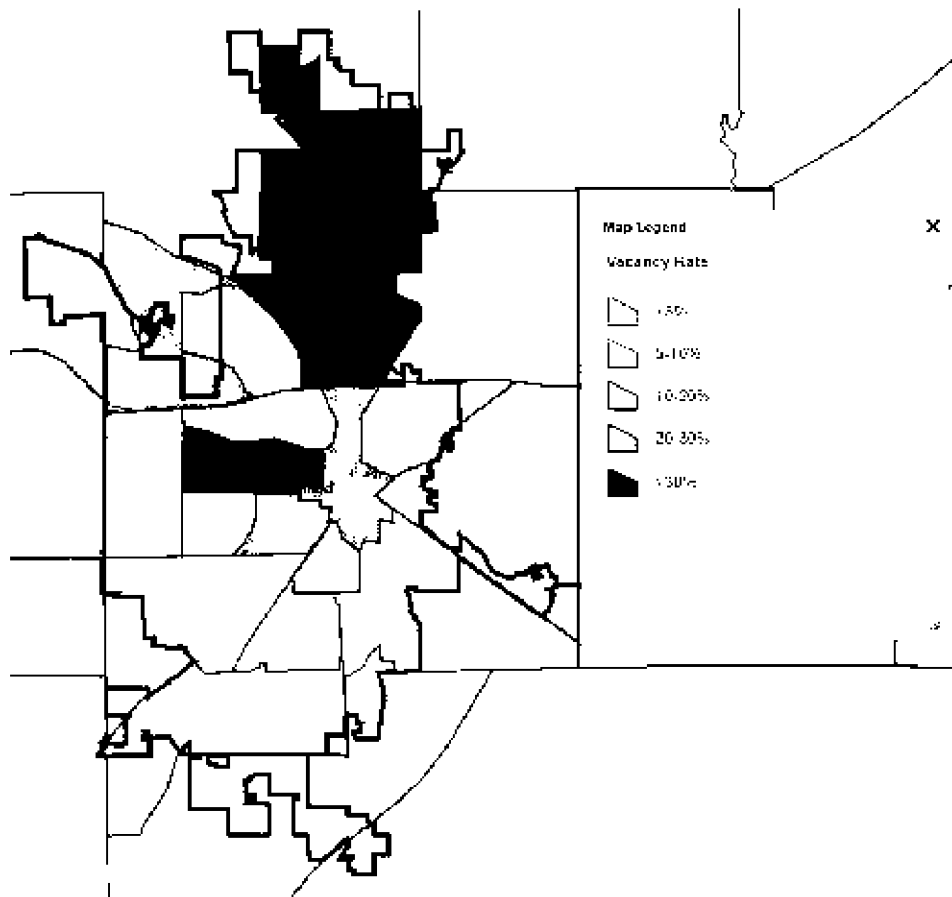
City of Mansfield, Ohio – Annual Action Plan 2025 – Housing and Community Development

property values, is dangerous both as a fire hazard and to those who may enter the buildings, and attracts those engaging in illegal and unsafe activity.

In addition, there are households in the City that experience overcrowding. 11% of the households in the City had 1.01 to 1.50 occupants per room. 1.2% of City households had 1.51 or more occupants per room.

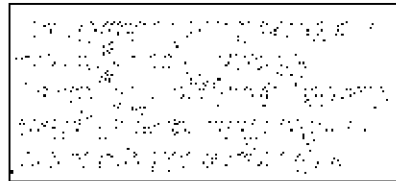
Housing condition is important from both an external and an internal perspective. Houses that become deteriorated externally cause blight in a neighborhood, which can bring disinvestment, lower property values, discourage talent from moving to an area, and lead to a vicious circle of poverty and decline within a neighborhood.

Map 5B: Vacancy rate, by census Tract, in the City of Mansfield



Data source: CRD Maps

From an internal perspective, housing can provide a sense of security, identity, privacy, belonging, and control. It acts as a stabilizer, a constant, a place to come home to each night. Poor housing can also make us sick or unsafe. Unaffordable housing can cause stress and insecurity.



Also, houses of this era often have hazards such as lead-based paint or asbestos. Lead-based paint, asbestos, moisture issues, and mold are likely to be environmental health hazards in many of the housing units built prior to 1960.

As shown on Table 5A, there are an estimated 1,586 owner-occupied units with lead hazards. Of those, 365 units are occupied by low- and moderate-income households, and 66 of the low-occupied units are estimated to have children under 6. There are also an estimated 1,157 renter-occupied units with lead hazards. Of those, 659 units are occupied by low- and moderate-income households, and 123 of the low-occupied units are estimated to have children under 6.

Table 5A – Lead-based paint hazards

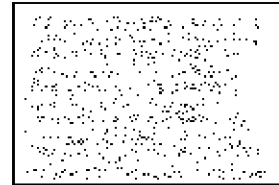
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 |
|--------------|--------|----------------------|-------------------------|-------------------------------------|-----------------------------------|-----------------------------------|---|---|---|---|
| Year Built | Tenure | Total Occupied Units | % units with lead paint | # of occupied units with lead paint | % occupied units with lead hazard | # occupied units with lead hazard | % Units with hazard occupied by low/moderate income | # units with hazard occupied by low/moderate income | % LMI units with hazard with children under 6 | # LMI units with hazard with children under 6 |
| Before 1940 | Owner | 2,354 | 18.0% | 424 | 44.2% | 188 | 44.3% | 83 | 27.7% | 29 |
| | Renter | 1,459 | 20.0% | 292 | 44.2% | 130 | 44.3% | 58 | 27.7% | 21 |
| 1940-59 | Owner | 3,140 | 18.0% | 565 | 18.0% | 102 | 18.0% | 19 | 18.0% | 4 |
| | Renter | 1,994 | 18.0% | 359 | 18.0% | 70 | 18.0% | 14 | 18.0% | 3 |
| 1960-69 | Owner | 2,393 | 12.0% | 287 | 12.0% | 42 | 12.0% | 8 | 12.0% | 1 |
| | Renter | 2,217 | 12.0% | 266 | 12.0% | 38 | 12.0% | 6 | 12.0% | 1 |
| Total Owner | | 7,137 | | 1,276 | | 360 | | 155 | | 35 |
| Total Renter | | 5,660 | | 1,016 | | 278 | | 122 | | 27 |
| Total | | 12,797 | | 2,292 | | 638 | | 277 | | 62 |

1. Percent lead hazard: 1999 HUD estimates based on percent units with identified lead paint compared to 1940-59 (per HUD National Lead Paint Survey, 1992), and applying this rate (18%) to 2000-59 percentage (44.2% in 1999) (see percentages from HUD Economic Analysis of HUD Rent or Lead-Based Paint Hazards, Sources: Census 1990-2022 ACS, Column 4; HUD 1999 National Survey of Lead-Based Paint, Column 1; Limiting Childhood Lead Poisoning, President's Task Force on Environmental Health Risks and Safety Risks to Children, 1990; Column 8, 2022 ACS, column 10; Fixing Childhood Lead Poisoning, President's Task Force on Environmental Health Risks and Safety Risks to Children, 2000).

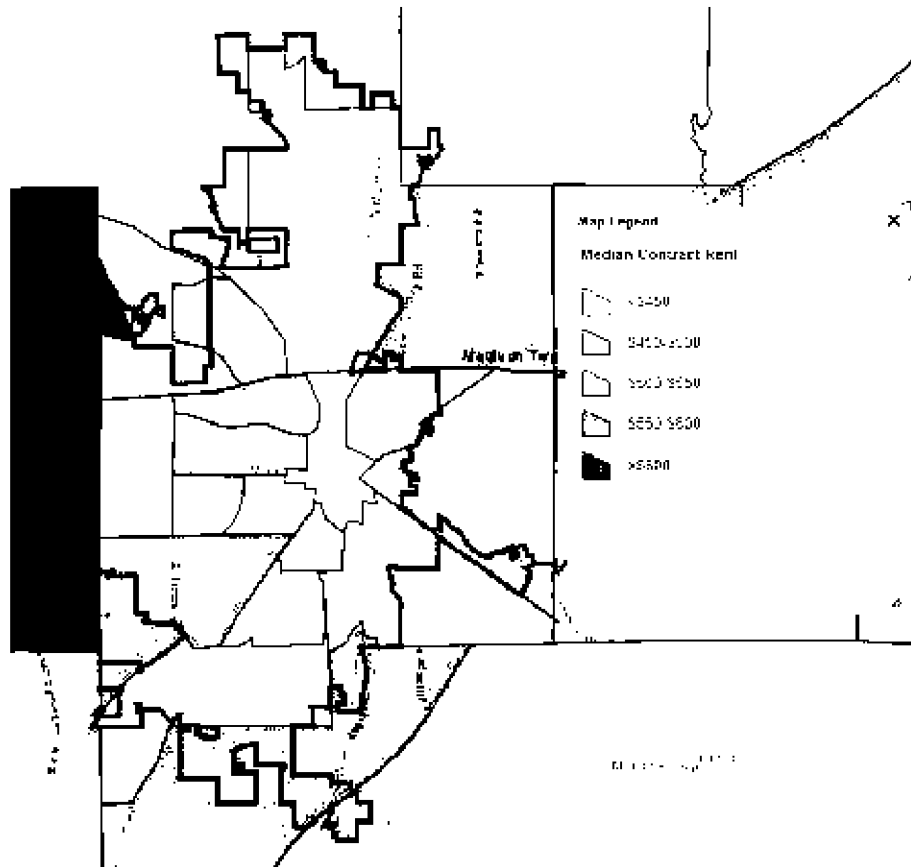
Housing is important, and the quality of housing matters both to the individuals and households residing there, and to the community in which the housing resides. There is a significant need for improvements to the housing stock within the City of Mansfield, which is aging, and which has not been consistently maintained in good condition. This is a problem for both owners and renters. This is even a greater problem in many of the census tracts where concentrations of racial minorities, families with children, and households in poverty reside.

Housing Affordability

Next to housing quality, the biggest housing problem in the City at large is housing affordability. 3,959 renter households under 80% of area median income are paying more than 30% of their income on housing, and 1,725 renter households under 80% of area median income are paying more than 50% of their income on housing. For owner households a similar situation exists. 1,563 owner households under 80% of area median income are paying more than 30% of their income on housing; and 498 owner households under 80% of area median income are paying more than 50% of their income on housing.



Map 5C: Median Contract Rent



Data source: CIM Maps

City of Mansfield Housing and Community Development Department, 2022-2025 Strategic Plan

On the average, household income is not rising as fast as housing costs (see Table 5B) in the City of Mansfield. The number of households living in poverty continues to be significant. It will be necessary to work both ends of this problem, by both improving the incomes of lower income households, and by increasing the amount of quality, affordable housing stock. On the income side, there has been identified a significant need for education/job training to match people's skill sets with available good paying jobs. It will also be necessary to address barriers to job entry and advancement.

Table 5B: Change in Cost of Housing and income over time

| | Base Year: 2017 | Most Recent Year: 2022 | % Change |
|------------------------------------|--------------------|---------------------------|----------|
| Median Home Value (owner-occupied) | \$77,000 | \$97,300 | 20.9% |
| Median Contract Rent | \$591 | \$723 | 19.4% |
| Median Income | \$34,219 | \$40,996 | 16.9% |

Data source: 2013 ACS (Base Year), 2018 ACS (Most Recent Year)

Overall housing strategies should include additional production of affordable housing for both owners and renters. This can be done through rehabilitation and new construction. There is also a need for additional rental assistance, and for improving job opportunities for low-income households.

Housing Needs

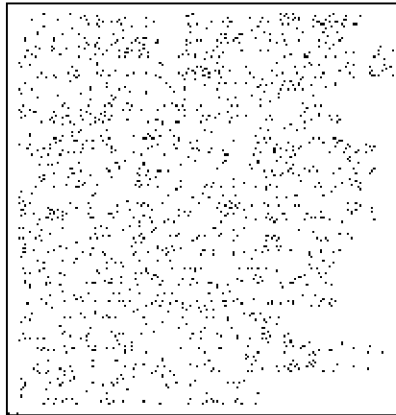
Both improved housing quality and affordability were identified in the public survey and stakeholder survey as important needs. We also found that some population groups are more likely to struggle with housing issues as we completed the City's Consolidated Plan. We created a chart showing these disparate impacts from the information reviewed in that document. Affordability (see Table 5C). The areas reviewed included the following:

- Lacks complete kitchen facilities
- Lacks complete plumbing facilities
- more than 1.5 persons per room
- 0, or negative income
- Housing cost burdened

Disparate impacts were looked at for various racial/ethnic groups and at various income levels. There were disparate impacts noted for housing quality, overcrowding, and households lacking any income, as noted in the bullets above. However, there were no disparate impacts noted around housing cost burden, the paying of more than 30% of a household's income on housing, or on severe housing cost burden, paying more than 50% of a household's income on housing.

City of Miami Housing and Community Development Department, 2021 Annual Action Plan

Renters are affected disproportionately by a number of these housing problems. For example, renters are more likely to be housing cost burdened, more likely to have inadequate plumbing or kitchen facilities, more likely to have inadequate income, and more likely to be overcrowded. These problems were all also more frequently experienced by those in the 0 to 30% AMI income category. These are the most vulnerable of the City's citizens.



Other vulnerable groups relative to housing problems and housing affordability include the elderly and female heads of household with children. About one third (34.6%) of all households in the City have at least one person 65 or older. Strategies to address this vulnerable population will likely need to be multi-pronged, including housing, services, and other strategies.

Female householders, with no husband present, with related children under the age of 18, are also a vulnerable group. 52.4% of all households in this category were below the poverty level, compared with 25.0% of the general population.

Table 5C: Disparate Impact by Race/Ethnicity

| Race | One or more of 4 housing problems | | | | One or more of 4 severe housing problems | | | | Housing Cost Burdened | | | |
|--------------------------------|-----------------------------------|--------|--------|---------|--|--------|--------|---------|-----------------------|--------|----------|-----------|
| | 0-30% | 30-50% | 50-80% | 80-100% | 0-30% | 30-50% | 50-80% | 80-100% | 0-30% | 30-50% | Over 50% | No income |
| White | | | | | | | | | | | | |
| Black/African American | | | X | X | | | | | | | | |
| Asian | X | | | | | X | | | | | | |
| American Indian, Alaska Native | | | | | | | | | | | | |
| Pacific Islander | | | | | | | | | | | | |
| Hispanic | X* | | | | X* | X | X | | | | | |

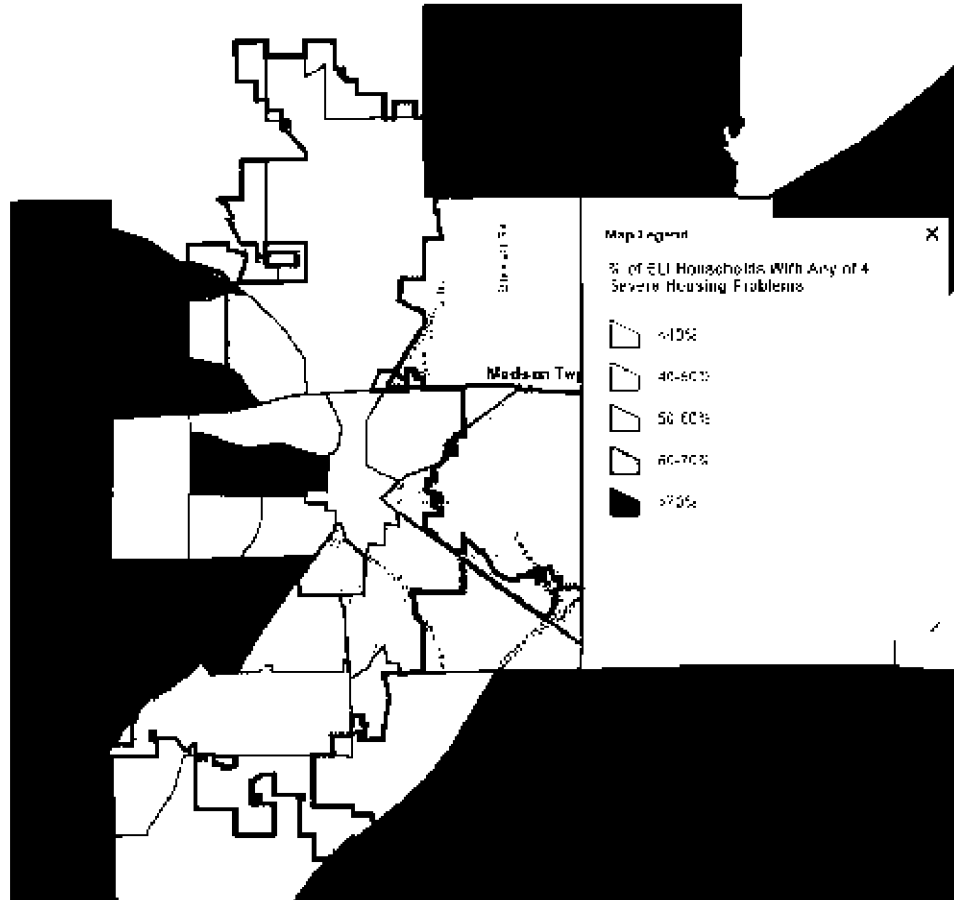
Data source: 2018 ACS

*This is a double count of households with 0, or negative income

Figure 14: Map 5D: Percentage of extremely low-income households with any of four severe housing problems, by census tract

Both the cost and the quality of housing will need to be addressed, as lower income households have inadequate housing options. It will also be important to address the need to raise incomes of lower income households, who have not seen wages rise as rapidly as other sectors of the population within the City of Mansfield.

Map 5D: Percentage of extremely low-income households with any of four severe housing problems, by census tract



Data source: CPD Maps

As described above, renters are affected disproportionately by a number of these housing problems. For example, renters are more likely to be severely housing cost burdened, more likely to live in older, less well-maintained housing units, more likely to have inadequate income, and more likely to be

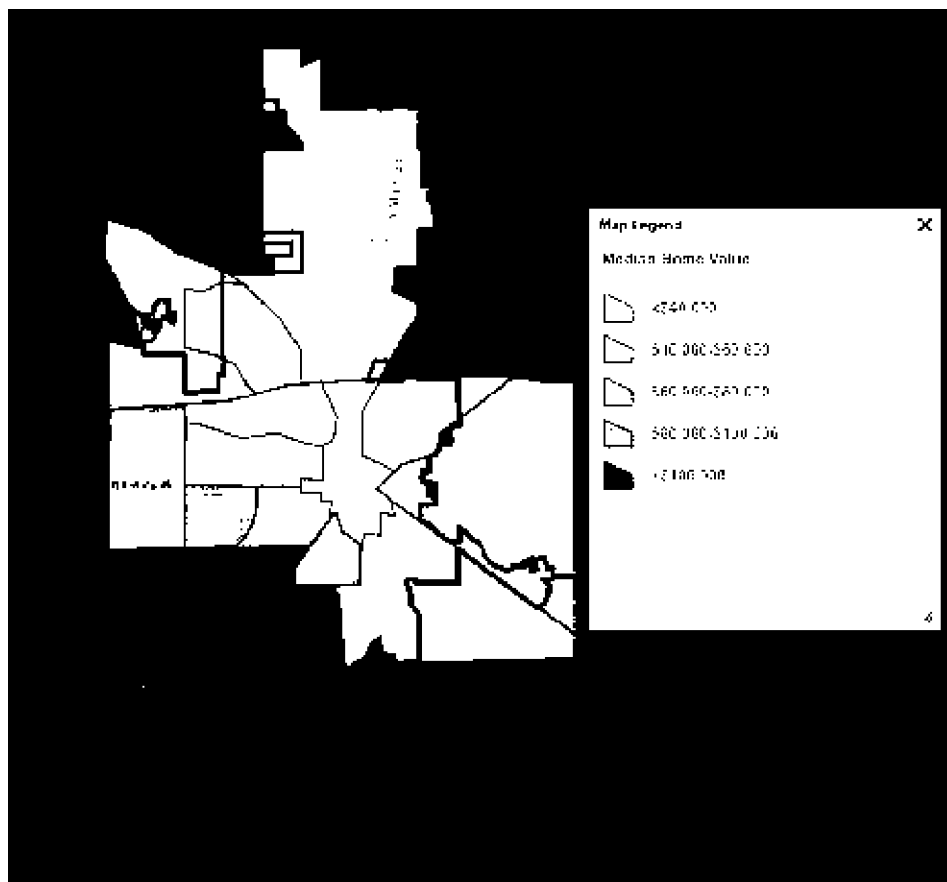
7.1.11 Map 5E: Median Home Values in the City of Mansfield

overcrowded. These problems are all also more frequently experienced by those in the 0 to 30% AMI income category. These are the most vulnerable of the City's citizens.

Homeownership and Lending

As discussed in the section on housing affordability, housing is unaffordable for many lower income households. Homeownership is particularly out of reach for many lower income families. With median housing values at \$97,300, a household getting an FHA loan would need to earn \$39,720 annually to keep their housing payments affordable. Nearly 1/2 of City residents could not afford to pay the monthly costs associated with a house at this value.

Map 5E: Median Home values in the City of Mansfield



Data source: GIS Maps

7.1.1.1 Fair Housing and Equal Opportunity: Lending Practices and Information

The Home Mortgage Disclosure Act (HMDA)—enacted by Congress in 1975 and implemented by the Federal Reserve Board’s Regulation C—requires lending institutions to report public loan data to the federal government. Private individuals as well as businesses and other organizations can access this data for review. Fair Housing groups examine HMDA data in order to:

- Determine if there are racial and/or ethnic disparities (or other disparities such as by gender) among persons denied mortgage loans, and
- determine if there are racial and/or ethnic disparities (or other disparities such as by gender) among borrowers obtaining high-cost loans.

In 2009, the Federal Financial Institutions Examination Council (FFIEC), looking at lending patterns from 2004–2008, reported, that, as confirmed in previous studies, African American and Hispanic borrowers received high-cost loans more frequently than did non-Hispanic White borrowers. The FFIEC also found that in 2008 African Americans and Hispanics encountered significantly higher rates of denial for both home purchases and refinancing than did non-Hispanic Whites.

Table 5D shows the HMDA data for 2022 for the City of Mansfield. Though the small number of loan applications for some of the minority/ethnicity groups can tend to skew the data, it appears that there are significant disparities between the percentage of approvals for loans for white households and for minority households. This does not necessarily imply overt discrimination, as there can be multiple reasons for application denial, including valid underwriting criteria, such as inadequate income to make monthly payments. At the very least though, this shows that for some minorities their access to homeownership is limited.

Table 5D: Loan denial rates in the City of Mansfield

| Applicant race | Number of loan applications | Number of applications denied by lending institution | Percentage denial by race and ethnicity |
|---|-----------------------------|--|---|
| American Indian or Alaska Native | 5 | 4 | 80% |
| Asian | 19 | 4 | 21% |
| Black or African American | 66 | 40 | 61% |
| Native Hawaiian or Other Pacific Islander | 1 | 1 | 100% |
| White | 2,479 | 620 | 25% |
| Hispanic/Latino | 37 | 12 | 32% |

Data source: 2022 HMDA Data from <https://www.freddiemo.com/data/hmda/>

One of the systemic impediments to fair housing choice nationally is lack of available banking in communities of color. The majority of financial institutions do not have a branch present in neighborhoods of minority concentration. Data from the Office of the Comptroller of the Currency suggests there is a direct correlation between having a bank account and obtaining a mortgage. The percentages of African Americans and Hispanics with a bank account are significantly lower than for Whites.

The City of Mansfield has worked and collaborated with a number of organizations to combat lending discrimination, predatory lending practices, mortgage rescue scams, and other foreclosure-related problems such as abandoned housing and blight caused by the neglect of bank-owned (REO) properties in minority neighborhoods. Barriers to fair housing choice and to housing availability still exist in our region.

Additional information regarding the availability of banking services in minority neighborhoods is available in the City of Mansfield's Housing Needs Assessment Report.

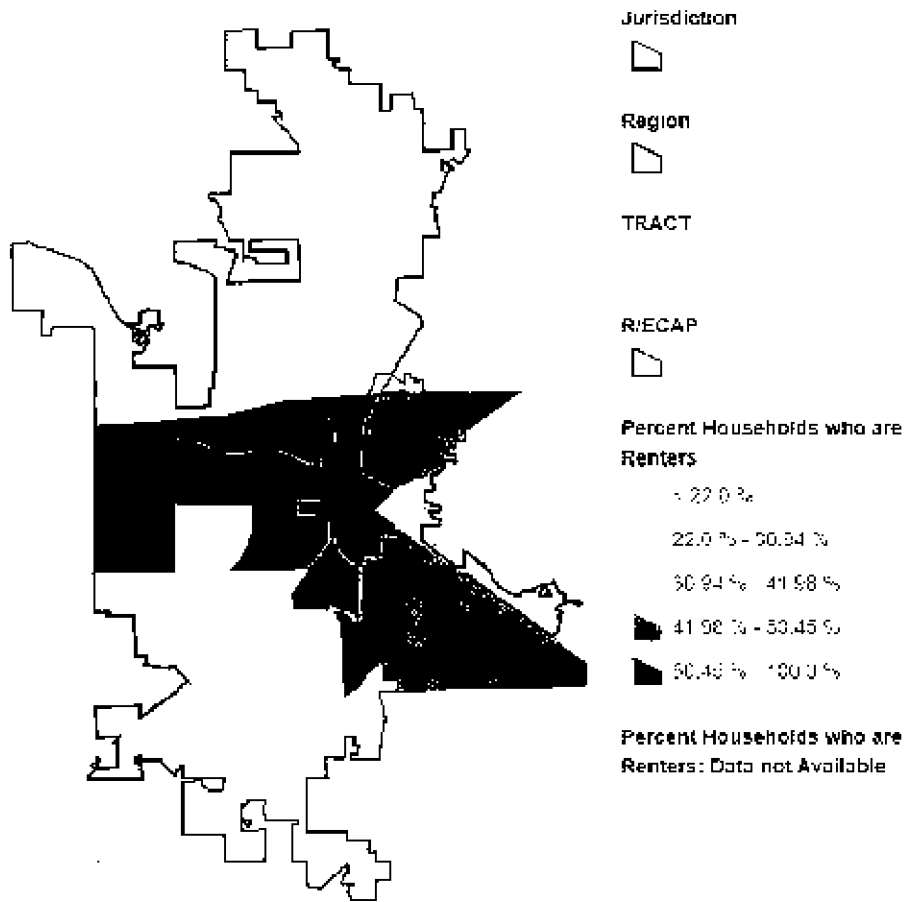
Rental Housing

Map 5F below shows the percentage of households who are renters in the City of Mansfield, by census tract. Overall, the percentage of households who rent is higher in the City of Mansfield (49.8%), than for the State of Ohio (33.2%). However, rental housing meets an important need for lower-income households. Even rental housing is unaffordable to some of these households.

The average monthly rent for a house in the City of Mansfield is \$753. In order to afford to pay this monthly rent, a household would need to earn \$29,320 per year. Over 1/3 of City residents could not afford to pay this rent. Considering that many of the homes below these values are in poor condition, this leaves a significant sector of the population with few affordable and decent housing options.

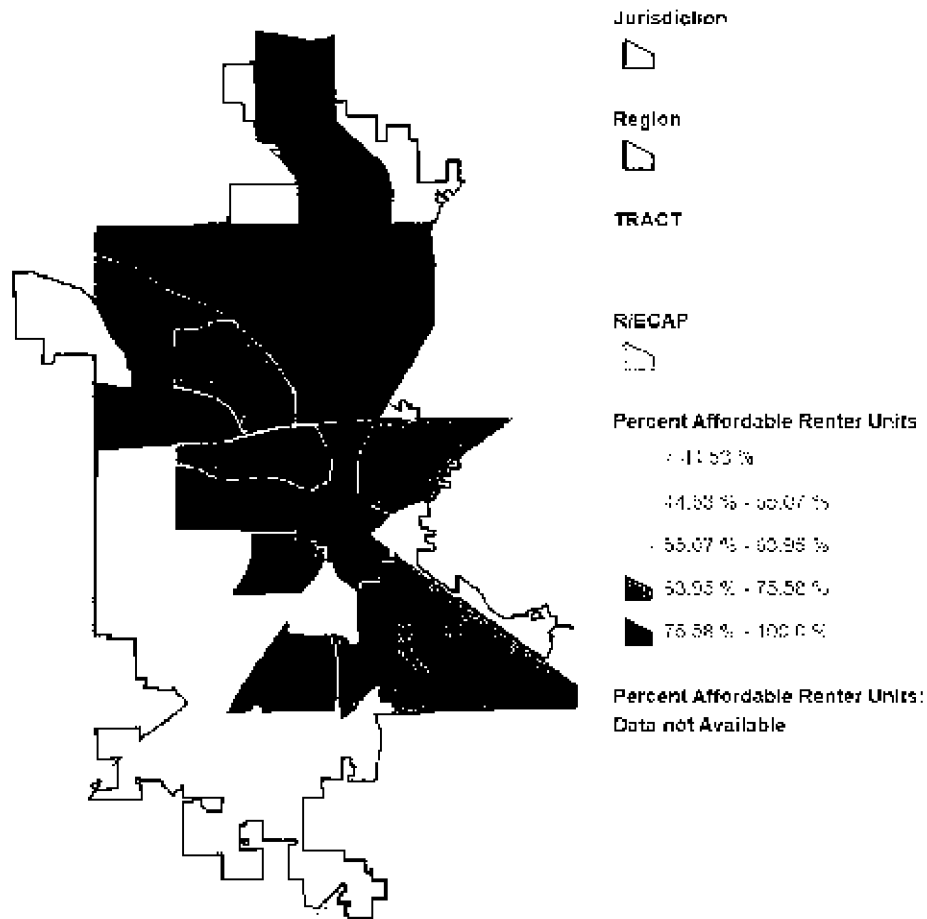
The HOME and Fair Market Rents are adequate to meet market rents, but because there is a shortage of quality rental housing, and because there is a shortage of rental assistance to help people to afford these rents, a need exists for additional quality rental units to be produced, and for additional rental assistance to be offered. This affordable rental housing shortage is more acute in some parts of the City than others, as shown on Map 5G. The condition of rental housing was also identified as a significant problem in our surveys and public meeting, as was landlord discrimination and unethical practices.

Map 5F: Percent households who are renters



Data source: HUD Enterprise Geospatial Information System (eGIS)

Map 5G: Percent affordable rental units, by census tract



Data source: USD Enterprise Geospatial Information System (eGIS)

Housing Accessibility for Those with Disabilities

Accessible housing is an important component of ensuring equal access to all. As described previously, the City of Mansfield is challenged in many of the less expensive neighborhoods with older housing stock. This housing is often not accessible. The City of Mansfield does provide home repair programs to address this issue, by making modifications to improve accessibility. Still, there is a shortage in many areas for adequately accessible units.

City of Mansfield Housing and Community Development Department Housing and Community Development

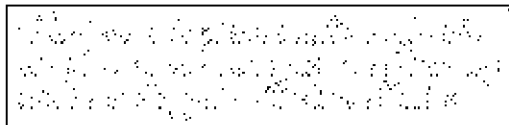
Housing for those with disabilities must include a variety of options to meet the unique needs of persons with diverse types of disabilities. Service needs include housing placement, intermediate care, supported living programs, supported employment, sheltered workshops, and rental subsidies for independent living.

The elderly, especially in very low income households, face housing difficulties based upon their particular housing needs (size of units, and types of fixtures and amenities), and on the basis of the cost burden they bear for housing and the fact that most are limited by fixed incomes. The frail elderly and those with disabilities may need additional assistance to live independently and have additional requirements for their housing, such as elevators, grab bars in the bathroom, and special types of kitchen and bathroom fixtures.

According to the 2022 ACS, 6.5% of the population in the City of Mansfield are veterans. Veterans are more likely to have disabilities and health issues than the population at large. These challenges can impact their access to affordable and appropriate housing.

Housing Barriers and Choices

A basic premise of all housing markets is that there should be a spectrum of housing choices and opportunities for residents. This concept recognizes that housing choice and needs differ in communities because of factors such as employment mix, household income, the age of the population, proximity to employment, and personal preference. Local housing markets and labor markets are linked to one another, and a strong local housing market and mix of quality housing choices at a variety of price points can strengthen the economy, just as a strong labor market can help residents to afford decent housing.

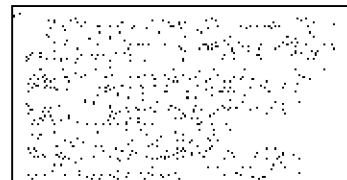
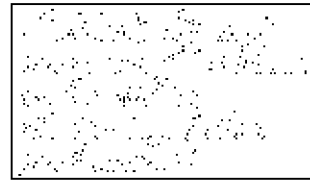


Racial minorities and households with children continue to face disadvantages in the housing market. For example, Table 5E shows disparities in homeownership rates for a variety of minority groups. We have identified a number of disparities and barriers to housing for those in protected classes. We will list them below.

- The age condition and potential environmental hazards of housing have been identified as problems for some households in the City. Both the age and the condition of housing is more likely to be a challenge in older neighborhoods, especially neighborhoods that are predominantly rental. In some cases, landlords do not maintain properties in good condition. Because these neighborhoods tend to be more affordable, they are where concentrations of households in poverty reside. As we have already noted, there is a correlation between these pockets of poverty and high concentrations of minorities and families. There is a significant need for improvements to the housing stock within the City of Mansfield.

7.2.1 Affordable Housing and Access to Opportunity, Quality of Life, and Equity

- Housing affordability is also a concern. Even though housing in the City of Mansfield is relatively inexpensive, wages are also low. Wage increases are not keeping pace with rising housing costs due to inflation. While we did not find a disparity in housing affordability for racial groups generally, persistent poverty in the area makes housing a reach for a large segment of the population, and poverty tends to be more prevalent among minorities. Households with children, especially single-parent households, which are predominantly women, are particularly prone to poverty, as are the elderly population, which are often on fixed incomes. Associated with this problem is housing insecurity.
- A review of this data demonstrates that some of the most impoverished areas of the City are also areas with high concentrations of minorities, though there are also areas of poverty with significant poverty as well. These areas need additional consideration in addressing housing needs and equity within the City. Particularly vulnerable areas are the five census tracts that we reviewed in the section on access to opportunity.
- Both lending inequity and landlord discrimination were identified as challenges for minorities.
- Overcrowding is a problem for some households in the City. This is particularly a problem for larger households with children. Average household size in the City is smaller than the State average, but the housing stock tends to be old and small, with some former single-family houses divided up into multiple rental units. There is a need for additional larger housing units, especially rental units.
- High costs associated with housing development has also been identified as a barrier. Through vehicles such as zoning ordinances, subdivision controls, permit systems, and housing codes and standards, the City has attempted to ensure the health, safety, and quality of life of its residents while minimizing the barriers that may impede the development of affordable housing. None of these measures is intended to restrict the affordability of housing, though these regulations may on occasion affect the pricing of housing. Several related elements are potential barriers, considering the diverse nature of the City:
 - o A common cost barrier to all housing is the length and complexity of the permitting and review process necessary to ensure the development is safe and meets all code requirements.
 - o Lot sizes are often small, making infill development challenging.
 - o Aging infrastructure such as water, sewer, and streets can also be a barrier to development.



7. City of Mansfield Strategic Plan: Affordable Housing, 2022-2026, 2022

- o Low property values are also an impediment, as the cost to develop a structure may easily exceed the cost to sell or rent it at a profit.
- o The most important impediment to affordable housing revolves around the lack of income of the City residents. In addition, the cost of maintenance, renovation, or redevelopment is also very high. Many structures, as noted earlier, are very old and contain both lead-based paint and asbestos, which must be remediated in order to bring the structure up to code. These facts make housing redevelopment expensive and many times put quality affordable housing out of the reach of low-income households.

Table SE: Percentage of households who are homeowners in the City of Mansfield, by race/ethnicity

| Race/Ethnicity | % of households that are homeowners |
|--|-------------------------------------|
| White | 54.9% |
| Black/African American | 33.9% |
| American Indian and Alaska Native | 26.3% |
| Asian | 43.4% |
| Native Hawaiian and other Pacific Islander | .0% |
| Hispanic or Latino | 53.9% |

Data source: 2022 ACS

Chapter 6: Publicly Supported Housing

Supply and Occupancy

As can be seen in Table 6A, there are a total of 274 households in the City of Mansfield that have been assisted with housing through the HOME program. Many of those (110) are households that have been assisted with homebuyer assistance. The remainder are homeowners assisted with rehabilitation (69), and multi-family rental units (95). There are also 12 HUD multifamily projects, with 516 total units (Table 6B). There are 15 Low Income Housing Tax Credit Projects in the City, with 1,867 total units. This is the bulk of the assisted units to improve affordability for low income households. This adds up to a total of 2,474 assisted households. 142 of the HUD units are also LIHTC funded, so we reduced the total to avoid double counting.

Table 6A: HOME funded Units in the City of Mansfield since 1994

| Homebuyer Assistance Provided | Homeowner rehabilitations Completed | Multifamily rental units |
|-------------------------------|-------------------------------------|--------------------------|
| 110 | 69 | 95 |

Data Source: HUD Resource Exchange HOME Reports

Landscape of Supported Housing

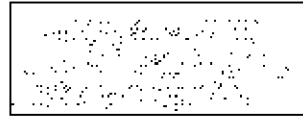
Many of the HUD and LIHTC units are old, and need to be replaced. For example, the majority of the Tax Credit funded units are already past their original 15-year period of affordability. If we remove these older, expired units, it reduces the current number of LIHTC funded units to 45.

Table 6B: HUD Multifamily Properties

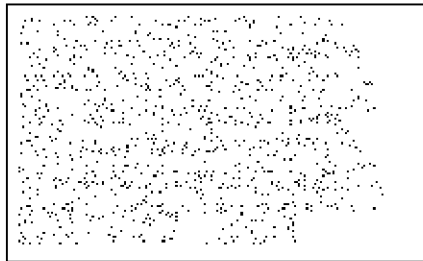
| HUD Multifamily Properties | Number of Units |
|-------------------------------------|----------------------|
| Middlebrook Meadows Apartments | 24 |
| Homesked Place | 24 |
| Mansfield Memorial Homes Apartments | 80 total/49 assisted |
| West Park Senior Center | 73 |
| Friendship Manor | 22 |
| Appewood Place Apartments II | 51 total/50 assisted |
| Total: | 280 |

Data Source: CPD Maps

There is also a need for housing appropriate for single women with children, including those that are victims of domestic violence, and a need for accessible housing to serve the needs of the elderly and persons with disabilities.



Supportive housing for those transitioning from homelessness to permanent housing was also identified as a significant need. This is especially true for families. There is an ongoing



loss of viable, decent affordable housing units, and especially rental units from the market as units age. Because subsidies are often required to keep units both decent and affordable, this is not a problem that the private market can remedy on its own. There is an ongoing need for improvements to the housing stock through a variety of types of subsidy that will support

rehabilitation, new unit development, and affordability. Improving the housing stock, and removing blight will provide for a basic need of the City's citizens, will help the City attract and retain local talent, and will improve the City's attractiveness to potential employers.

Table 6C - Low Income Housing Tax Credit Projects in the City of Mansfield

| Low Income Housing Tax Credit Projects | Number of Units | Year Placed in Service |
|--|-------------------|------------------------|
| Mansfield Homes II | 30 | 2005 |
| Mansfield Homes IV | 30, 24 low-income | 2005 |
| Mansfield Homes V | 30, 25 low-income | 2007 |
| Byrner Apartments | 43 | 1992 |
| Logan Place | 45 | 2013 |
| Mazzer Tract I | 37 | 1997 |
| Total: | 210 | |

Data Source: CPO Maps

Summary

The age, condition, and availability of rental housing has implications for the vulnerable populations described in this report, and the development of additional rental housing is an important component of ensuring access to decent housing for minorities, ethnicities, families, the elderly, and others with barriers to entry into the housing market.

Chapter 7: Fair Housing Activities

Fair Housing Resources

HUD uses its partnerships with communities and Fair Housing Initiatives Program (FHIP) agencies to conduct fair housing enforcement, capacity building, education and outreach activities. The Permitting and Development director is the Fair Housing contact/coordinator for the City of Mansfield. The City has been able to help persons who were unfairly denied housing.

The City carries out the following scope of services relative to fair housing:

- **Community Outreach**

The City will disseminate Fair Housing and Tenant/Landlord brochures to social service organizations in the City.

- **Education**

The City provides four-hour sessions of fair housing training which meets or exceeds the 3 credit hours required by the Ohio Department of Real Estate to the real estate professionals/property investors serving the City market. The City is assisted in their provision of this training by Catholic Charities, a local non-profit with knowledge of this topic.

Over the past year, HOME provided the following trainings in the City of Mansfield:

- ❖ 4 fair housing trainings

In addition to the work at the federal level, the State of Ohio and local jurisdictions have policies, laws, practices, and protocols that affect fair housing choice in the local community. Government policies and procedures that regulate, monitor, or otherwise impact rental, sales, and property insurance practices can play a significant role in promoting fair housing choice in the community.

Fair Housing Enforcement

The City of Mansfield employs a proactive approach to fair housing enforcement. All complaints are forwarded to the local fair housing contact/coordinator, for investigation, and they also conduct random testing. Testing is long recognized in the fair housing field as a best practice for identifying discrimination and moving communities forward in affirmatively furthering fair housing choice.

The City carries out the following fair housing scope of services:

- **Enforcement**

The City fair housing contact/coordinator will receive and investigate complaints of illegal housing discrimination based on race, color, nationality, sex, religion, handicap,

7. City of Mansfield, Ohio – Fair Housing, Equal Housing Opportunity

and familial status. From residents of the City. When a complaint has been investigated and verified, the complainant will be counseled and advised of the various options available for the enforcement of the law and referred to appropriate legal services, as appropriate.

Over the course of the past year, the City investigated 25 complaints of fair housing discrimination or related concerns.

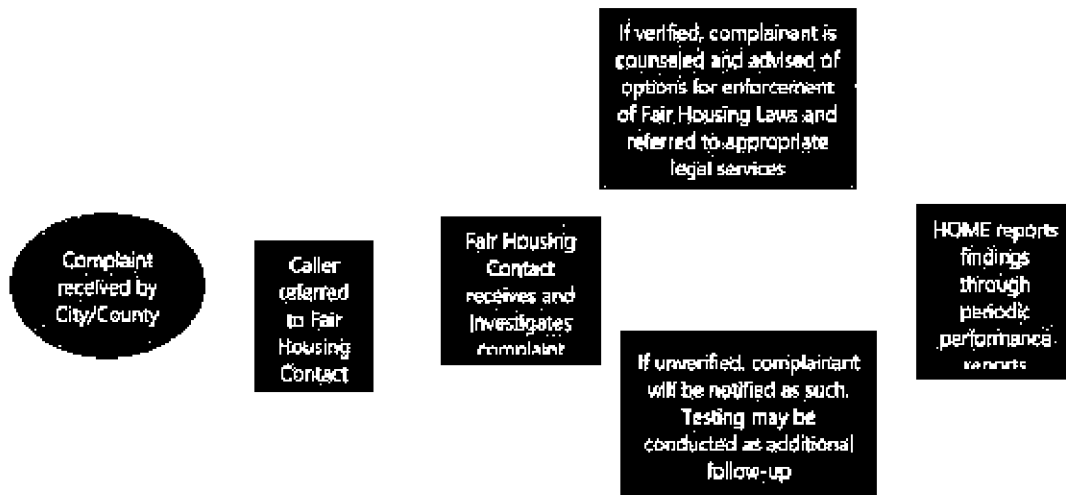
- **Testing**

HOME will conduct random rental tests in the City. Those tests will be conducted to ensure that families with children and those of minority status are receiving equal treatment. HOME will also conduct sales tests of randomly selected listings in the City of Mansfield.

The City of Mansfield is also served by the Ohio Civil Rights Commission (OCRC). The primary function of The Ohio Civil Rights Commission is to enforce state laws against discrimination. OCRC receives and investigates charges of discrimination in employment, public accommodations, housing, credit and higher education on the bases of race, color, religion, sex, national origin, disability, age, ancestry or familial status. OCRC has cooperative agreements with the U.S. Department of Housing and Urban Development (HUD) that allows coordination in their investigations and avoid duplication of efforts in seeking to end discrimination.

A protocol for handling fair housing complaints in the community has been established. Complaints that are filed through the identified department are handled as follows:

Figure 1: Fair Housing Complaint Process



Chapter 8: Identification of Impediments to Fair Housing Choice

Upon completion of review and assessment, six impediments to fair housing choice have been identified in the City of Mansfield. An impediment was included when the issue was determined to be systemic, not limited to anecdotal data, and involved public and private policies, practices, environmental conditions and/or procedures that affect fair housing choice. Impediments to fair housing choice are defined as any actions, omissions, or decisions that restrict, or have the effect of restricting, the availability of housing choices based on race, color, religion, sex, disability, familial status, national origin, military status, ancestry, or age (40 and over). Studies and analysis of impediments to fair housing choice conducted nationally would indicate that there are systemic barriers to fair housing choice that exist in nearly all communities. Not all of those impediments were supported through the local data analysis for this AIP. While these impediments may exist, only those verified through local data were included as findings in this AIP. Described below are the fair housing issues identified in this Analysis of Impediments, along with their associated contributing factors.

I. There is a **shortage of decent rental housing choices across the City**

Quality rental housing is in short supply across the City. Contributing factors that we found for this shortage are the following:

- Much of the rental housing stock, particularly the affordable housing stock is old and in deteriorating condition. This is partly because there has not been a lot of affordable rental housing built in recent years, in some cases maintenance by the property owner is lacking. This housing may have health hazards such as lead based paint, asbestos, or mold. It may also have unsafe electrical wiring, heating, plumbing, and other obsolete housing systems.
- There is also a lack of accessible housing options, leading to limited choice for persons with disabilities. The large percentage of people with disabilities in the city is also a factor that contributes to this issue. This also impacts the City's elderly population and veterans, who have higher incidences of disability than the general population.
- Finally, there is a lack of transitional housing and permanent supportive housing for households seeking to move from homelessness.

II. **High housing costs limits choice**

Housing that is affordable is in short supply. Contributing factors that we found for this shortage are the following:

- While housing in the area is relatively inexpensive, household incomes are also quite low. Increases in income have not kept pace with increases to housing costs due to

2.2.2. Many households in the area are in need of major housing repairs

inflation. We found that minorities and female-headed households with children tended to have higher poverty rates than the general population.

- Much of the existing housing stock is old, and in needs of major upgrades.
- Subsidies for affordable housing in this area are difficult to come by. For example, the LIHTC program favors other geographies, as currently structured.
- The high costs of housing development may not be a good investment for potential developers because property values and rents are relatively low.

III. Neighborhoods with affordable housing options provide low access to opportunity

We found that many of the areas where minority households and families with children reside provide low access to opportunity in a variety of areas, and are among the primary areas where affordable housing exists in the City. Contributing factors that we found for this lack of opportunity are the following:

- Schools in these areas were somewhat more likely to be of lower quality as measured by test scores.
- The engagement of residents with the labor market was not good in these areas.

IV. Minority households have reduced access to homeownership

Fewer minority households and families with children were homeowners than the general population, and overall homeownership rates in the City were low. This also contributes to less ability to generate wealth through real estate investment. Contributing factors that we found for this lack of opportunity are the following:

- The high cost of housing development, as noted above.
- The limited income of households in these groups, constraining their ability to provide a down payment, make high monthly payments, and meet other costs associated with homeownership.
- More loan denials by financial institutions for minorities.
- A lack of decent quality housing for sale.

V. Persistent poverty is a core element, and must be directly addressed to resolve the other identified barriers

- There has been disinvestment in this community for decades, and there is a need to create a framework and economic climate to attract good-paying jobs.
- Transportation appears to be an issue City-wide, with limited time frames when public transportation is available. This can limit job opportunity.

7. Labor Market Engagement and Opportunity: Employment, Unemployment, and Training

- Labor market engagement is low, particularly in high minority concentration areas. Based upon the average scores across all seventeen of the City's census tracts, labor market engagement appears to be the most limiting factor to opportunity. This raises the question, why are these communities not more fully engaged in the workforce? More research needs to be done to better understand and address this issue. Possible related factors may include the following:
 - A lack of education and/or adequate job training. We know that educational attainment is low in the City (see Table 43). It could also be that there is a mismatch between available jobs, and the type of education held.
 - A lack of childcare services.
 - A high concentration of persons with disabilities. We found in chapter 3 that the overall percentage of persons with disabilities is high for this area (70.8%, compared with an average of 14.1% for the State of Ohio). The Black/African American population had even levels of disability than the general population (25.0%), as did women (21.1%) and those over the age of 65 (36.5% for those aged 65 to 74, and 47.4% for those 75 years and over).

VI. There is a continued need for fair housing outreach, education, and enforcement

Fair housing outreach, education, and enforcement appears to continue to be needed in the community. Factors associated with this need are outlined below.

- There are ongoing requests for assistance in addressing a variety of housing challenges, and for addressing fair housing complaints.
- There appears to be a continued need for a better understanding of fair housing rules, requirements, and goals, based upon public feedback. People need a better understanding of their rights and responsibilities under the law.
- There may also be language barriers. We identified a small population with limited English proficiency.

Chapter 9: Action Plan to Address Identified Barriers

Recommended plans for addressing identified impediments to fair housing choice over the next five years are outlined below.

| Impediment I There is a shortage of decent rental housing choices across the City | | |
|---|---|-----------------|
| Goal I: Improve the availability of quality rental housing through activities to foster improvement of the housing stock and/or to develop additional rental housing units | | |
| Desired Outcome: Improved availability of quality rental housing choices, particularly affordable rental housing for those with limited incomes | | |
| Fair Housing Goals/ Activities | Responsible Party | Timeline |
| A. Support the development of additional housing units, and/or the improvement of existing units through funding and/or reduction of barriers. Ensure that accessible units are in the mix. | <ul style="list-style-type: none"> City of Mansfield Community Development Department | 2024-2029 |
| B. Encourage development of quality rental housing in geographies where it is in short supply, through support of development in these areas, and efforts to reduce barriers. | <ul style="list-style-type: none"> Local government officials Richland County MHA | 2024-2029 |
| C. Support the development of transitional housing, permanent supportive housing, and/or housing for special needs populations through funding and/or the reduction of barriers. | <ul style="list-style-type: none"> City of Mansfield Community Development Department Richland County MHA | 2024-2029 |

Impediment II: High housing costs limits choice.

Goal II: Improve housing choice through increased affordability.

Desired Outcome: More affordable housing options will exist for minorities, families with children, and others with current limited economic means and access.

| Fair Housing Goals/ Activities | Responsible Party | Timeline |
|--|---|-----------|
| D. Ensure that housing units developed under Goals A and B are affordable, and that other adequate affordable housing options are improved, where possible including MHA rent subsidies and protection from evictions. | <ul style="list-style-type: none"> ▪ City of Mansfield Community Development Department ▪ Richland County MHA | 2024-2029 |
| E. Provide more opportunities for economic advancement through education, job training, job creation, and services such as childcare supporting those seeking good jobs. | <ul style="list-style-type: none"> ▪ City of Mansfield Community Development Department ▪ Social services agencies ▪ Local colleges and career centers | 2024-2029 |

City of Mansfield Strategic Plan: Annual Action Plan, 2024-2029

Impediment III: Neighborhoods with affordable housing options provide low access to opportunity

Goal III: Improve access to opportunity for households in constrained neighborhoods

Desired Outcome: Access to opportunities will be improved for households currently living in neighborhoods where opportunities are constrained.

| Fair Housing Goals/ Activities | Responsible Party | Timeline |
|--|--|-----------|
| F. Seek to improve test scores of children through improvement of services for families with children, through support of improvements to the schools in disadvantaged neighborhoods, and through the support of goal E. | <ul style="list-style-type: none"> ▪ City of Mansfield Community Development Department ▪ Local school districts ▪ Social service agencies | 2024-2029 |
| G. Seek to improve engagement in the workforce through meeting the basic needs of households, and by supporting Goal E. | <ul style="list-style-type: none"> ▪ Social service agencies ▪ Local government officials ▪ Richland County RPA | 2024-2029 |
| H. Seek to improve environmental health through testing of children for lead levels, education, and support of Goal A. | <ul style="list-style-type: none"> ▪ Health department - primary ▪ Social service agencies – referrals to Health Dept ▪ City of Mansfield Community Development Department – referrals to Health Dept | 2024-2029 |

City of Mansfield Strategic Plan 2024-2029: Economic Development, Housing, and Community

Impediment IV: Minority households have reduced access to homeownership

Goal IV: To improve access to homeownership for minorities and other disadvantaged groups

Desired Outcome: To see homeownership rates improved for minorities and other disadvantaged groups.

| Fair Housing Goals/ Activities | Responsible Party | Timeline |
|---|--|-----------|
| I. Provide increased homeownership opportunities through the development of affordable housing for sale and the provision of down payment assistance programs tied to homebuyer education, credit clean-up, and counseling. | <ul style="list-style-type: none"> ▪ City of Mansfield Community Development Department ▪ Local housing agencies | 2024-2029 |
| J. Continue to provide fair housing education to real estate professionals and lending institutions, and to enforce fair housing violations as they occur. | <ul style="list-style-type: none"> ▪ City of Mansfield Community Development Department | 2024-2029 |

City of Mansfield Strategic Action Plan: Economic Development, Housing, and Community

Impediment V: Persistent poverty is a core element, and must be directly addressed to resolve the other identified barriers.

Goal V: To lower the percentage of people below the poverty level through education, improved access to jobs, better access to decent quality housing, and services geared to address identified needs.

Desired Outcome: There will be more people gainfully employed in decent paying jobs, and able to provide for the needs of their household.

| Fair Housing Goals/ Activities | Responsible Party | Timeline |
|--|---|-----------|
| K. Address community disinvestment through creation of a framework and economic climate to attract good paying jobs. | <ul style="list-style-type: none"> ▪ City of Mansfield Community Development Department ▪ Richland County RPA ▪ Local Chamber ▪ Local service providers | 2024-2029 |
| L. Improve the availability of transportation to good paying jobs at the times needed. | <ul style="list-style-type: none"> ▪ Richland County RPA ▪ City of Mansfield Community Development Department ▪ Local service providers | 2024-2029 |
| M. Improve labor market engagement, particularly in high minority concentration areas. <ol style="list-style-type: none"> 1. Support goals E, F, and G 2. Provide additional support for those with disabilities to encourage participation in the workforce, where possible | <ul style="list-style-type: none"> ▪ Social service agencies ▪ Local government officials ▪ Richland County RPA ▪ Local service providers | 2024-2029 |

City of Mansfield Strategic Plan 2024-2029 | Executive Summary | Fair Housing and Affirmative Action

Impediment VI: There is a continued need for fair housing outreach, education, and enforcement.

Goal VI: To educate people in the City of Mansfield on fair housing, particularly lenders, real estate professionals, property owners, and those in protected groups.

Desired Outcome: There will be a better understanding of rights and responsibilities regarding fair housing, and improved compliance throughout the City with fair housing requirements.

| Fair Housing Goals/ Activities | Responsible Party | Timeline |
|--|--|-----------|
| <ul style="list-style-type: none"> • N. Continue to provide fair housing education and outreach to citizens of the City, particularly those in protected classes. Also, provide education to property owners regarding their rights and responsibilities, and support Goal J. | <ul style="list-style-type: none"> • City of Mansfield Community Development Department • Local housing agencies | 2024-2029 |
| <ul style="list-style-type: none"> • O. Enforce the fair housing laws and conduct testing, as needed. | <ul style="list-style-type: none"> • City of Mansfield Community Development Department • Local housing agencies | 2024-2029 |

HOME-ARP

The City of Mansfield, Ohio



HOME-ARP Allocation Plan

December, 2022

Prepared with the assistance of



1

Annual Action Plan
2025

147

HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoCs serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries, however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

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

On August 29, 2022 a Brochure announcing an initial public/stakeholder meeting, with detailed information regarding the amount of HOME-ARP funding City of Mansfield had received, a summary of the purpose of the funding to reduce homelessness and increase housing stability and asking for their attendance was posted on the City of Mansfield website.

On August 29, 2022 an email invitation to the Public meeting was sent to 50+ Stakeholders that included the brochure and a description of what would be covered during the meeting. We emphasized the importance of their feedback and the value that they could bring in sharing what

they see as needs within the community, and activities that they feel would be helpful in meeting those needs. They were asked to verbally invite others, including members of the public, and to post the brochure, and send the meeting information electronically to others.

September 8, 2022 a Virtual Public and Stakeholder Meeting was held, as scheduled. The agenda included a presentation that included a look at the data that demonstrated potential needs for the funding, and a review of eligible activities that may be funded with HOME-ARP funds. Chat was provided for their comments and questions. The 14 attendees also participated in polling as a way of providing additional feedback to areas of need, what they thought the best uses would be, and areas that were not as important to fund. Questions were all based on eligible uses of funds. Questions, discussion, and comments continued through the end of the Meeting.

September 20 – 22, 2022 interviews were completed with 15 key Stakeholders. These individuals represented organizations serving one or more of the qualifying populations. All qualifying populations were covered within this group. Interviewees were provided ahead of time with all the eligible uses of funds. As a part of the interviews, they were asked to describe their organization and goals, how the funding could help them achieve their goals. They were then asked to think outside of their organization and to discuss needs within the community relative to the HOME-ARP funding, and about the best use of the funding in their communities.

This information was very valuable in identifying needs. This information was compiled in a document listing each organization and their confirmed areas of coverage and services. The information was then reviewed, and four key areas of focus were identified and discussed as a part of recommendations.

On November 14 and 18, 2022 four additional interviews were conducted with organizations that could potentially develop housing and/or provide Supportive Services to better flesh out the types of housing that is needed, constraints that could drive preferences relative to the qualifying populations, and other activity delivery and funding details.

List the organizations consulted:

| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback |
|--|---|---|---|
| Catholic Charities | Homeless service provider, working through the local Continuum of Care, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. | Interview. 2 nd interview with potential housing providers | Most significant needs: 1) Availability of housing for homeless. 2) Wrap around services: mental health services, need transportation to get to appointment. Rising inflation is impacting lower income households. A lot more homeless and more people at food pantry. A lot of nontraditional homeless: elderly, families. Work on preventing people from becoming homeless, there is already funding for homeless. |
| Mansfield Metropolitan Housing | Public Housing Agency (PHA's), Public agencies that address the needs of all four of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. | Public Meeting. Interview. 2 nd interview with potential housing providers. Public Hearing | Need matching dollars for Turtle Creek 120 units. Vision to keep building units. 80% toward affordable housing and agree that there is a need for services. They have Voucher's, but not developing housing. They are lacking in housing capacity. A lot of opportunities have been lost, and improvements to housing are much needed. Both the quality and the quantity of housing is poor. |
| Safe Program Mansfield City Schools | Homeless service provider, working through the local Continuum of Care, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. | Interview | 11 th 12 th graders, college students: a lot of homelessness at this level. Transportation, housing, lots of evictions, renting homes that are not decent, safe, and sanitary. Significant needs: High housing cost, and a lack of affordable housing. Need services and transportation is really important. Programming for kids after school. HOME-ARP Funding should be centered around housing. Families are living in unstable housing. Make sure that public transportation is taken care of. Ensure enough activities for children in the town. We don't want to put all of the poor people in the same place. Break the cycle of human poverty. |

| | | | |
|---|--|------------------|---|
| <p>Catalyst Life Services</p> | <p>Homeless service provider, working through the local Continuum of Care.</p> | <p>Interview</p> | <p>Landlords calls almost every day where people are getting evicted for minor reasons, and places are not kept up. People are locked out for raising concern about living conditions.</p> <p>Transportation is a big problem. Legal counsel is also an issue. Unsuitable homes, evictions, etc. non-working refrigerator, black mold.</p> <p>Everyone wants to address the homeless situation, but they don't realize the extent that children are involved.</p> <p>Need more CHW's or case workers.</p> <p>Would like a facility that is mobile and can provide showers, food, etc. A shelter with a place where people can sleep, eat, and then go out and walk around.</p> <p>One of the primary barriers is the current cost of housing. A larger amount of available and affordable housing is needed. Permanent housing. A little development of tiny homes. A lot of people need their own space.</p> <p>Those who have mental health issues end up having guests who cause problems, causing them to get evicted.</p> <p>City as a whole should be addressed.</p> <p>They are getting homeless from neighboring Counties brought to them.</p> <p>Need funding for severely mentally ill to get people connected with housing. Money down, housing supplies, etc.</p> |
| <p>Mansfield Police Department</p> | <p>Public agencies that address the needs of all four of the qualifying populations.</p> | <p>Interview</p> | <p>Get people connected to work.</p> <p>Have created a homeless team of police officers who are working overtime to identify true homeless and those in need of mental health assistance.</p> <p>Have people coming from Mount Vernon, Norwalk to Richland County because they know services are here. More problems with congregating. Almost too many services.</p> <p>HOME-ARE Funding should be used for housing. Lack of housing. Get people on the</p> |

**North End
Community
Improvement
Collaborative
(NECIC)**

Homeless service provider, working through the local Continuum of Care.

Public Meeting and Interview. Public Hearing

right track, they need somewhere to go. Group homes, assisted living, and standard housing.

Best geographic target area in the City of Mansfield- put a pin in square and draw a circle out a mile. North end and South end.

Need to continue to strengthen the food insecurity within the north end. Transportation is still a huge barrier. There are too many restrictions on funds that are provided.
HOME-ARP Funding -- Housing - Increase on rent has soared. Use dollars to truly help everyone. Places to live that are livable, setting some type of standards for landlords that addresses slum lords. Hold landlords accountable. Make sure housing is up to code and the rent is at a decent price. Help with timely housing assistance programs. Landlords will false advertise, house in person does not look like anything in picture. Not only that a lot of them (form of bullying), having the crazy application fee and purposely not renting out the property. Nonrefundable application fees charged to see house
North End is most vulnerable area West Side in Saint Pete District (they are working on this). All sides of town a lot of 2- bedroom housing. Need housing for families HUD funds require boy girls to have separate bedrooms and after a certain age (vouchers, etc. foster care qualifying) Need 3 bedroom and up - 1 and 1.5 bathrooms A lot of families have several children. NECIC is interested in the provision of supportive services.

StrongerChoice

Homeless service provider, working through the local Continuum of Care.

Interview

Need shelter space. Not enough emergency overnight shelter space. A lot of abandoned houses. A lot of people going in the houses Copper stolen for money. Fires started. Garages are slept in, or abandoned cars. Not safe for residents or person themselves.

| | | | |
|---------------------------|--|--|---|
| <p>The Shelter</p> | <p>Domestic violence and homeless service provider, working through the local Continuum of Care.</p> | <p>Public Meeting, Interview, 2nd Interview with potential housing providers.</p> | <p>Need affordable housing, so they can have a place to send people when they have jobs and are doing well and ready to find homes. They get a job and still can't find a place to live. They start going to homeless shelters. They start banking up again, which leads to other problems. They often can get an apartment and start moving in together which sounds good at first, but they get back into their old issues. Often keep repeating process.</p> <p>They are 100% community funding. They are unsure of any funding that can help supplement, have been told they do not qualify. They are a 501C3 and could really use additional funds for operating costs.</p> <p>Need housing case manager – was covered by another grant that ended. Trying to get more funding for this.</p> <p>Most significant need for these funds is housing. Need about 1,000 units of affordable housing. Sharrod Brown visited about 5 years ago – said biggest issue is affordable housing. Last summer there was an influx of people experiencing homelessness that arrived downtown and started camping out in gazebo area and other public places. Got attention of city officials. Not a lot of other resources. Harmony House is always full.</p> <p>Should be a continuum of care access point that we are all using. Data base, document daily number of unmet needs. Have the tool. Harmony House is access point and Catholic Charities. Whole intent is when someone calls for services, they are entered into data base. Called the VISPDAT. However, screening tool has what appears to be invasive questions for someone experiencing homeless. Like 35 questions. Not really practical, but on other hand when used properly it gives the city opportunity to prioritize who needs it most. Need more organizations to use it.</p> |
|---------------------------|--|--|---|

First Call 211

Homeless and domestic violence service provider, and veterans group service provider working through the local Continuum of Care. Representative of Richland County Coalition on Housing and Homelessness. Also, a representative for Richland County to the Region 2 Balance of State continuum of care

Public Meeting, Interview

Need support for operating and administrative costs, especially since we are expanding space. Could use more funding for rental assistance.

Could be beneficial for us to have a centralized person who is not from Harmony House or Catholic Charities that could be housing coordinator. Maybe a shared person employee that could help coordinate, working with community partners.

Coordinated entry access point is broken in Richland County. Two access points are Harmony House and Catholic Charities. If someone calls Harmony House and asks for shelter, they don't have the ability to capture diversion data. Funding could be used for a central clearing house of available units. Right now, we have put together a list of landlords, apartment buildings, and complexes. We run into a lot of individuals that need more one on one assistance to locate available housing and completing applications. One of the potential outcomes could see be to have a clearing house of available units as well as potential tenants who need housing. There are multiple community health workers in multiple organizations that are working one on one with clients, but it is still a decentralized system.

There is a new system called Unite Ohio, they need more funding.

If we had a housing coordinator in their department salary, and wages to fund that position. Right now, our services are 24/7, and contracted with an outside entity another 211 center to take overnight calls. If they could bring that data 24 hours would need payroll dollars. Could fund a pilot project.

No coordination with the Street project -- Richland mental health and police. Data needs captured, i.e., streets project. How many people do we truly have on the streets?

If John Smith is being evicted from a permanent supportive housing project. No one knows that to pick him up and connect him to another supportive housing.

COOHIO

State Co-Applicant for the Balance of State CoC serving the jurisdiction's geographic area.

Interview

There is a significant need for investment in affordable housing for the qualifying populations.

Data provided relative to needs and capacity.

Harmony House

Homeless service provider, working through the local Continuum of Care.

Interview, 2nd Interview with potential housing providers

The need for housing for homeless in our community is so great. We have a lot more people calling that need shelter. Need services in-house and transportation is a huge issue. Housing stock is desperately needed. Homes are old and in poor condition. We need affordable housing. There are gaps in funding for staffing and basic operations. Geographic target area would be closer to downtown. Funding should be put towards housing-transitional and permanent supportive.

Summarize feedback received and results of upfront consultation with these entities:

The feedback received through meetings, and individual interviews covered a broad scope, but there was consistency of need expressed in these four areas: 1) The need for more quality affordable housing. People are coming out of shelters with nowhere to go and not enough units for those with vouchers. (Often rental units are substandard, landlords don't want to rent to them, cost of rent is increasing. 2) Permanent Supportive Housing (PSH) and supportive services. Need a safe place to go, that provides resources for a variety of needs to create a better chance of

success in life for families and individuals. This will provide for better outcomes and not as many people that will end up starting the cycle all over again through homelessness and in need of recovery services. 3) Expand homeless shelters, services, and resources. There are a lot more homeless and people at food pantries. Too many are homeless due to lack of affordable housing, or mental health problems. Homeless shelters need expanded services and increased capacity i.e., transportation, case management, and counseling. 4) A centralized data system. Continuum of care access point that everyone is using. This would help with unmet needs and collaborative coordination between providers.

Data was reviewed that supported these focus areas of need. Additional interviews with service providers were scheduled and completed to discuss partnering of resources to cover more of the needs in these areas with the HOME-ARP funding. Resulting in focus areas of development of affordable rental housing, supportive services, non-profit capacity building, and non-profit operating.

Public Participation

In accordance with Section V.B of the Notice (page 13) PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must allow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115

Template:

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

- **Date(s) of public notice: 12/1/2022**

- Public comment period: start date - 12/1/2022 end date - 12/16/2022
- Date(s) of public hearing: 12/6/2022

The City of Mansfield Community
Development Department
Substantial Amendment Notice 2022
A&P
HOME-ARP Plan Public Hearing

The City of Mansfield is announcing a public hearing in reference to the 2021 HOME-ARP Plan. The public hearing will be held on December 6, 2022 @ 7:30 PM in City Council Chambers. Copies of the proposed plan will be available on our website at <https://ci.mansfield.oh.us/community-development/home-arp> or in our office at 30 N. Diamond St. # 8 Mansfield, Ohio 44902 on or before November 10, 2022. Comments regarding this plan must be submitted in writing to ackerman@ci.mansfield.oh.us or via mail to 30 N. Diamond St. # 8 Mansfield, Ohio 44902. Comments must be received on or before December 15, 2022 @ 4:00 PM to be considered.

(MNU Dec 8, 22#5303476)

Order Confirmation for Ad #: 0005908475



Customer: CITY OF MANSFIELD, COMMUNITY
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MANSFIELD OH 44902 USA
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Product: CITY OF MANSFIELD, COMMUNITY
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| Order Start Date: 12/01/2022 | Order End Date: 12/31/2022 | Order Type: 0200 | Order Type: 0200 | Order Type: 0200 | Order Type: 0200 | | | | | | | | | | | | | | | | | | |
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| \$ 100.00 | 0.00 | \$ 100.00 | Invoice | \$ 0.00 | \$ 100.00 | | | | | | | | | | | | | | | | | | |
| <p>See Report Details</p> <table border="1"> <thead> <tr> <th>Product</th> <th>Qty</th> <th>Start Date</th> <th>End Date</th> <th>Placement</th> <th>Position</th> </tr> </thead> <tbody> <tr> <td>WCO-Mansfield News Journal</td> <td>1</td> <td>12/01/2022</td> <td>12/31/2022</td> <td>WCO-Legal</td> <td>Legal Notices</td> </tr> <tr> <td>WCO-Mansfield Times</td> <td>1</td> <td>12/01/2022</td> <td>12/31/2022</td> <td>WCO-Legal</td> <td>Legal Notices</td> </tr> </tbody> </table> | | | | | | Product | Qty | Start Date | End Date | Placement | Position | WCO-Mansfield News Journal | 1 | 12/01/2022 | 12/31/2022 | WCO-Legal | Legal Notices | WCO-Mansfield Times | 1 | 12/01/2022 | 12/31/2022 | WCO-Legal | Legal Notices |
| Product | Qty | Start Date | End Date | Placement | Position | | | | | | | | | | | | | | | | | | |
| WCO-Mansfield News Journal | 1 | 12/01/2022 | 12/31/2022 | WCO-Legal | Legal Notices | | | | | | | | | | | | | | | | | | |
| WCO-Mansfield Times | 1 | 12/01/2022 | 12/31/2022 | WCO-Legal | Legal Notices | | | | | | | | | | | | | | | | | | |

Describe the public participation process:

The public participation process was started in August 2022 by including an additional public meeting at the beginning, beyond that required. Our objective was to create as much public, organizational awareness, and opportunities for feedback as possible to increase the possibility of determining the best recommendations for use of funds. A virtual public meeting was scheduled, flyers were distributed physically to several City and Public Offices which included Council Chambers, Community Development, Mayor's office, Library, Crossroads, Harmony House and other downtown businesses. Electronically information was provided (which included a QR code) and posted on the City of Mansfield website. Emails were sent to approximately 51 Stakeholders that included Police department, and members of the Homeless Coalition. Detailed information in regard eligible activities that may be funded with HOME-ARP funds were included.

December 1 - December 16, 2022 Draft of plan will be reviewed and made available to the public, Public Hearing and Comment Period

December 6, 2022 at 7:00 PM a Public Hearing was held with prior publications and notices in newspapers, through verbal and electronic communication. Stakeholders Alan Mitchell, NECIC commented that they are interested in, and available to provide supportive services as it relates to housing. Steve Andrews, Mansfield Metropolitan Housing Authority provided comments supporting the significant need for additional housing in the community. These organizations were part of interview process prior to the Public Hearing.

In the Public Hearing attendees were reminded of the opportunity of the public comment period ending on December 16. There were no comments from the public during the public comment period

There were no comments from the public at the Public Hearing, Tuesday, December 6

Describe efforts to broaden public participation:

August 29, 2022 - A Brochure announcing initial public meeting, with detailed information regarding the amount of HOME-ARP funding the City of Mansfield had received, a summary of the purpose of the funding to reduce homelessness and increase housing stability and asking for their attendance was posted on the City of Mansfield website, emailed to 50+ stakeholders, and hard copies provided to several City and Public Businesses.

We emphasized the importance of their feedback and value they provide in sharing what they are seeing as needs and activities they feel would be helpful in meeting those needs. They were asked to verbally invite others, post brochure, and send the meeting information electronically to others.

September 8, 2022 - A Virtual Public Meeting was scheduled and held. The agenda included a presentation that included a look at the data that showed possible needs for the funding, reviewed eligible activities that may be funded with HOME-ARP funds. Chat was provided for their comments and questions. The 14 attendees participated in polling as a way of providing additional

feedback to areas of need, what they thought the best uses would be, and areas that were not as important to fund. Questions were all based on eligible uses of funds. Questions, discussion, and comments continued through the end of the Public Meeting.

December 1 – 16, 2022 – Draft of plan reviewed and made available to the public. Public Hearing and Comment Period.

December 6, 2022 -- Public Hearing held, which included a presentation of the draft plan outlining goals and plans, seeking to further educate the public on the contents of the plan. We also encouraged comments from the public at the meeting or through the public comment period that would end December 16.

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

There were no comments from the public at the Public Hearing or during the Public Comment period.

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

There were no comments from the public at the Public Hearing or during the Public Comment period.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of all four of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Table 2: Homeless Needs Inventory and Gap Analysis Table

| Homeless | | | | | | | | | | | |
|---|-------------------|------------|-----------|-----------------------|-----------------|---------------|-----------|------------------------|-------------|------------|--|
| | Current Inventory | | | Homeless Population | | | | Gap (Surplus) Analysis | | | |
| | Family | | Adult | Family | Adult | Victims of DV | Family | | Adults Only | | |
| | # of beds | # of units | # of beds | 10 (at least 1 child) | 181 (w/o child) | | # of beds | # of units | # of beds | # of units | |
| Emergency Shelter | 40 | 10 | 40 | | | | | | | | |
| Transitional Housing | | | | | | | | | | | |
| Rapid Rehousing | 6 | 2 | 25 | | | | | | | | |
| Permanent Supportive Housing | 40 | 20 | 60 | | | | | | | | |
| Total emergency and transitional housing | 46 | 12 | 40 | | | | | | | | |
| Total long-term housing with supportive services | 46 | 22 | 94 | | | | | | | | |
| Total Numbers | | | | 5 | 49 | 1 | 9 | | | | |
| Number in emergency shelter | | | | | 58 | | | | | | |
| Number in transitional housing | | | | | 0 | | | | | | |
| Number unsheltered | | | | | 9 | | | | | | |
| Current Gap | | | | | | | | | | | |
| Temporary housing, including emergency shelter, transitional housing, and rapid rehousing options | | | | | | | | | 9 | 5 | |
| Permanent supportive housing options | | | | | | | | 7 | 3 | 49 | |

From Continuum of Care Housing Inventory Count (HIC) for 2021, the most recent available

Numbers are based upon the 2022 HUD Annual Performance Report for Richland County, and the 2022 and 2019 (more detailed) Point in Time Count captured through the Balance of State Continuum of Care, and are the most recent available

¹ Number is based upon the 2019 Health Policy Institute of Ohio, profile of Family Violence in Hamilton County, each year there are 2,000 reports of abuse or neglect filed with children's services, 147 children placed into custody, 134 reports filed of abuse, neglect or exploitation of seniors, an estimated 980-1,500 adults physically abused by a current or former intimate partner, 295 people filing petitions for civil protection orders, and 73 adults and 85 children seeking shelter in Hamilton County domestic violence shelters. Therefore, the need is likely greater than what is represented by the number of persons seeking shelter here.

² This is a double count of persons already counted in the other categories.

Assumes 2.2 persons per household for families with children, and 1.2 persons per household for adults only households.

³ These numbers assume that all current permanent supportive housing units are already occupied by households and unavailable to the current homeless population.

Table 3: Housing Needs Inventory and Gap Analysis Table

| Non-Homeless Housing Gap Analysis | | | |
|---|-------------------|-----------------|---|
| | Current Inventory | Level of Need | Gap Analysis |
| | # of units | # of households | # of households |
| Total Rental units ¹ | 9,541 | | |
| Rental units affordable to Extremely Low Income (ELI) households | 3,894 | | |
| Additional Rental Units Affordable to Very Low Income Households (at or below 50% AMI) ² | 8,621 | | |
| Number of ELI households | | 4,643 | |
| Number of ELI households estimated to be renting based upon % of households that rent vs. own for those below poverty level in the City of Mansfield | | 3,670 | |
| Number of Low Income Households (Between ELI and 50% AMI) ³ | | 7,674 | |
| Number of Low Income households estimated to be renting based upon % of households that rent vs. own for those below poverty level in City of Mansfield | | 6,062 | |
| Number of affordable rental units to ELI households in the City above the number of ELI households that rent ⁴ | | | + 214 (Surplus of homes, but see note 4) |
| Number of affordable rental units to Low Income households in the City above the number of Low Income households that rent | | | + 2,559 (Surplus of homes, but see note 4) |

¹ Numbers of rental units at various contract rents is from the American Community Survey (ACS) five-year data for 2020. Numbers are approximations based upon the data.

² Numbers of households at various income levels is from the ACS five-year data for 2020. ELI and Low Income Limits by family size are from HUD 2022 Income Limits. Family size for determining affordability of contract rent was based upon the average renter occupied household size for the City of Mansfield, which is 2.21 persons. Numbers are approximations based upon the data.

³ Rental unit demand was based upon the percentage of households that are below the poverty level that rent rather than own the home (79%).

⁴ Even though the data shows a surplus of rental units, what we see in the data is that many of these rental units are older. What we heard from the many housing providers in the area was that the quality of the housing was much of the problem. Many of the houses are not decent, safe, and sanitary. Also, there is demand from higher income renters for many of these same units, making the reality on the ground more complex. Based on 2013 CHAS data in the City's 2019-2023 Consolidated Plan, there are 1,215 renter households and 370 owner households below 30% AMI that are paying more than 50% of their income on housing. This means that many of our most vulnerable have little income left for groceries, medicine, and other life necessities. This is more representative of the true gap, and especially highlights the need for affordable housing that is earmarked specifically for this population.

Table 4: Additional information on the City of Mansfield homeless population

| Other Homeless Population Characteristics | | | | |
|---|--|---|--|--|
| | Gender | Race/Ethnicity | Age | Other |
| Of the 67 homeless persons identified in the point in time count: | 31, or 46%, identified as Female (22% of unsheltered) | 44, or 66% identified as White (56% of unsheltered) | 17, or 25%, identified as under 18 years old (0% of unsheltered) | 7, or 10%, identified as having a mental illness |
| | 33, or 52%, identified as Male (67% of unsheltered) | 17, or 25% identified as Black/African American (9% of unsheltered) | 3, or 4%, identified as 18-24 (0% of unsheltered) | 2, or 3%, identified as having a substance abuse disorder |
| | For 1 person, the gender information was missing (1% of unsheltered) | 3, or 4%, identified as Native American (3.5% of unsheltered) 1, or 1%, identified as more than one race | 39, or 58% identified as between the ages of 25 and 64 (56% of unsheltered) 6, or 9% identified as over 65 years old (23% of unsheltered) | 9, or 13% were unsheltered 58, or 87% were in emergency shelters |
| | | 3 identified as Hispanic (22% of unsheltered) | Note that for the unsheltered, for 2 persons, or 22% of the total, age information was missing | 37, or 55%, were single at the time (44% for unsheltered) |
| | | For 2 persons race/ethnicity information was missing | | 30, or 45%, were in a household with at least one other person at the time (56% for unsheltered) |
| Of the 104 homeless persons engaged by the Homeless Response Team in May, 2022... | 33% identified as Female | 64% identified as White | 19% identified as 18-24 | |
| | 67% identified as Male | 33% identified as Black/African American | 27% identified as 25-34 | |

| | | | | |
|--|---|---|--|---|
| | | 1% identified as more than one race | 20% identified as 35-44 | |
| | | For 1% race/ethnicity information was missing | 16% identified as 45-54 | |
| | | | 1% identified as 55+ | |
| In comparing the numbers from the two counting methodologies, we note the following: | There are more homeless males than females, but a significant number of both. The percentage of females is lower for those unsheltered. | The race/ethnicity of both the sheltered and unsheltered homeless seems to be mixed, the percentage of the homeless population that identified as black is higher than the percentage of the general population. 22.6% of the population is Black/African American (2017 ACS) | A smaller percentage of the unsheltered homeless population appears to be children, than for the sheltered population. | The number of unsheltered homeless appears to be fairly consistent. |

Numbers are based upon the 2019 Point in Time Count captured through the Balance of State Continuum of Care, and are the most recent detailed count data available. This includes a count of both sheltered and unsheltered homeless. Estimates from local service providers indicate that these numbers may be growing, and were presented by Comd. in an article in the Mansfield News Journal, a local newspaper, titled "New pilot program aims to help Mansfield's homeless - Local officials finalizing plans to provide outreach, into, services." by News Correspondent Al Lawrence, published on Feb. 5, 2022, the following was noted:

"Rebecca Owens, the Regional Director of Catholic Charities in Mansfield, was quoted as saying that "the most recent annual count of homeless, which is required to receive funding from the U.S. Department of Housing and Urban Development, turned up about 100 sheltered and unsheltered individuals." Owens also was quoted as saying that "the Mansfield City School District's SAFE program has between 450 and 460 students who are considered homeless because they're living in a shelter or living with a relative or neighbor and could become homeless at any time." The article went on to indicate that "a number of people who have never been homeless before have become homeless because of COVID and other circumstances over the last three years."

* Percentages and numbers are based upon Homeless Response Team data for May 2-5, 2022. During this time frame 12 visits were made to areas around the City looking for homeless persons to connect with and assist. An average of 8.57 persons were encountered per visit. The focus here is on unsheltered homeless. In the program, behavioral health professionals from Caregyst Life Services will start partnering with law enforcement officers during three, 4-hour shifts per week to contact homeless residents, and seek to connect them with needed services.

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

According to the 2019 Point in Time Count captured through the Balance of State Continuum of Care, which is the most recent available information, there were 3 homeless family households with at least one child, and 49 homeless adult households. As shown on Table 4, these numbers include people across all of the age groups, with 17, or 25%, identified as under 18 years old, and 6 persons over the age of 65 identified.

For the January 22, 2019 Point in Time Count, there are approximately 58 persons residing in emergency shelters, and 7 persons that are unsheltered. 7 persons (10% of the total) were identified as diagnosed with a mental illness, and 2 (3% of the total) were identified as diagnosed with a substance abuse disorder.

From the January 22, 2019 Point in Time Count, there are approximately 3 American Indian/Alaskan Native, 17 Black/African American, 44 White, and 2 with missing race information. There are also 3 Latino/Hispanic persons experiencing homelessness. Compared with the balance of State, a larger percentage of the homeless population had the following characteristics: More of the population were female (+12%); a greater proportion of the population were Black/African American (+12%); and a smaller percentage of the population were unsheltered (-20%).

These distinctions are worth noting. It should, however, be noted that the overall percentage of the population in the City of Mansfield that is Black/African American (22.6%) is more than for the State of Ohio (14.1%), providing a context for the higher-than-average percentage of the homeless population that is Black/African American. 25.4% of the total homeless population were Black/African American.

A couple of other groups that need to be called out are the following:

The first is veterans: 9.5% of the population are veterans, who also typically have higher rates of disability. There was 1 identified homeless veteran, in a single person household.

The second is formerly incarcerated persons: Richland County has multiple correctional facilities. A report by Lucius Couloute of the Prison Policy Initiative, *Nowhere to Go: Homelessness among formerly incarcerated people*, finds that formerly incarcerated people are nearly ten times more likely to be homeless than the general public.

Table 5: Number of Households paying more than 50% of their income on housing

| | 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 | 325 | 105 | 0 | 630 | 145 | 90 | 25 | 260 |
| Large Related | 85 | 50 | 0 | 135 | 60 | 10 | 20 | 90 |
| Elderly | 250 | 120 | 35 | 405 | 125 | 85 | 70 | 280 |
| Other | 355 | 90 | 15 | 460 | 80 | 95 | 15 | 190 |
| Total need by income | 1,215 | 365 | 50 | 1,630 | 370 | 280 | 130 | 780 |

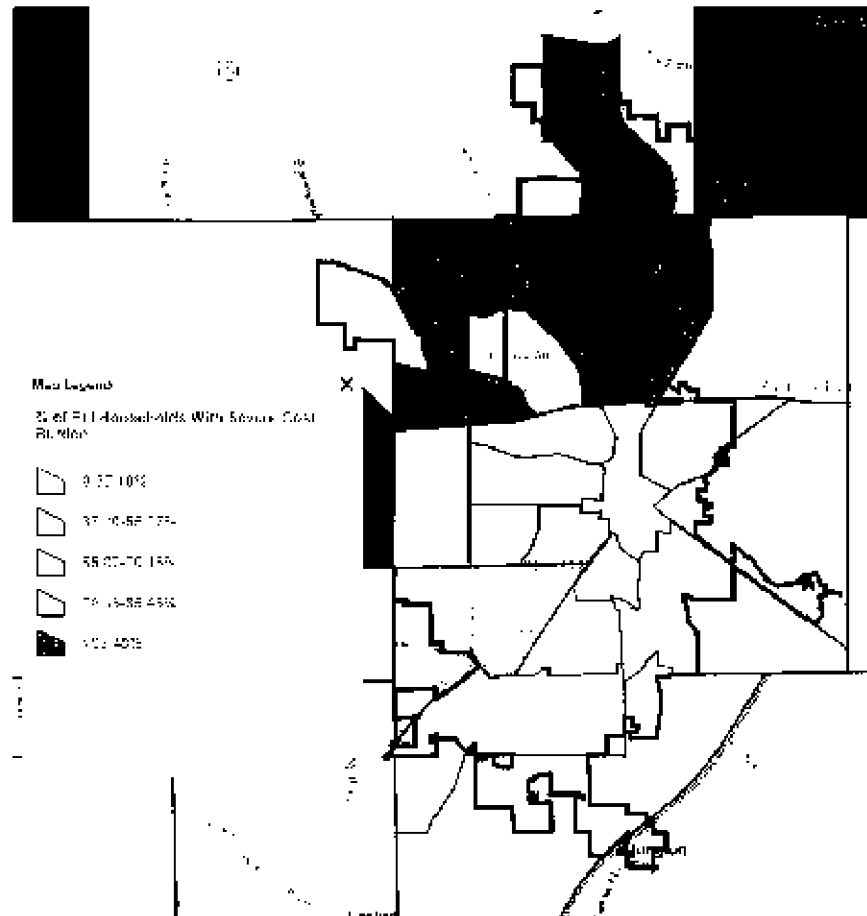
Cost Burden > 50%

Data: 2009-2014 CHAS
Source:

Table 6: Current 2022 Income Limits for Richland County

| FY 2022 Income Limit Category | Median Family Income Click for More Detail | FY 2022 Income Limit Category | Persons in Family | | | | | | | |
|-------------------------------|---|----------------------------------|-------------------|--------|--------|--------|--------|--------|--------|--------|
| | | | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 |
| Middletown, OH MSA | \$26,767 | Very Low (30%) Income Limits (L) | 15,050 | 19,650 | 23,950 | 27,950 | 31,950 | 35,950 | 39,950 | 43,950 |
| | | Low (50%) Income Limits (L) | 15,400 | 19,900 | 24,200 | 28,200 | 32,200 | 36,200 | 40,200 | 44,200 |
| | | Low (80%) Income Limits (L) | 21,550 | 27,450 | 33,350 | 39,250 | 45,150 | 51,050 | 56,950 | 62,850 |

Map 1: Geographic Distribution of ELI Households with Severe Housing Cost Burden



At Risk of Homelessness as defined in 24 CFR 91.5

As identified in the City of Mansfield's current Consolidated Plan, there are 2,765 households in the City of Mansfield that are in the extremely low-income category. According to the 2020 American Community Survey (ACS) 5-year estimate data profiles (2020 ACS), 2,154 households (11.6% of total households) earned less than \$10,000 a year. Also, according to the 2020 ACS, 11,380 people, or 24.5% of persons in the City of Mansfield were below the poverty level. It is also noteworthy that 3,281 children, or 36.2% of all children in the City were also below the poverty level.

In its 2018 Final Quarterly Performance Report covering the period 1/1/18 to 12/31/18, the Continuum of Care for the Balance of State in Ohio identified facilities operating as shelters, providing permanent housing solutions, and conducting rapid rehousing in Richland County. These facilities had a total of 489 households exiting to all destinations. Of those, 277 households (56.6%) were able to locate to permanent destinations. This left 212 households (44.4%) in need of a permanent housing solution (see table 8).

Though this methodology may allow for some double counting, there is still a significant number of households at risk of losing housing and needing a permanent housing solution each year in Richland County.

As shown in Table 7 the impact of housing problems and housing cost burden had an impact across various racial groups. It is also worth noting that the risk of homelessness has a geographic component. This is illustrated by maps 1 and 2 showing the distribution of ELI households with Severe Housing Cost Burden, and the dispersion of the Black/African American population in the community. Notice that in both cases, the North end of the City is disproportionately impacted.

Table 7: Races/Ethnicities that are disproportionately impacted by housing cost burden, paying more than 30% of their income on housing

| | Percentage of general population | Number of ELI households with housing cost burden | Percentage of ELI households with housing cost burden | Statistically significant Disproportionate impact? |
|--------------------------------|----------------------------------|---|---|--|
| Jurisdiction as a whole | 100.0% | 12,779 | | |
| White | 79.1% | 10,040 | 82.3% | No |
| Black / African American | 22.6% | 1,850 | 13.5% | No |
| Asian | 0.7% | 75 | 0.6% | No |
| American Indian, Alaska Native | 4.0% | 25 | 2% | No |
| Pacific Islander | 0.1% | 0 | 0% | No |
| Hispanic | 2.8% | 140 | 1.1% | No |

Data is from the current Consolidated Plan for the City of Mansfield.

* The White population, which at 79.1% of the general population, has 82.3% of the population that is housing cost burdened in the 0 to 30% of area median income population group. For it to be considered to be a statistically significant impact, HUD requires that the

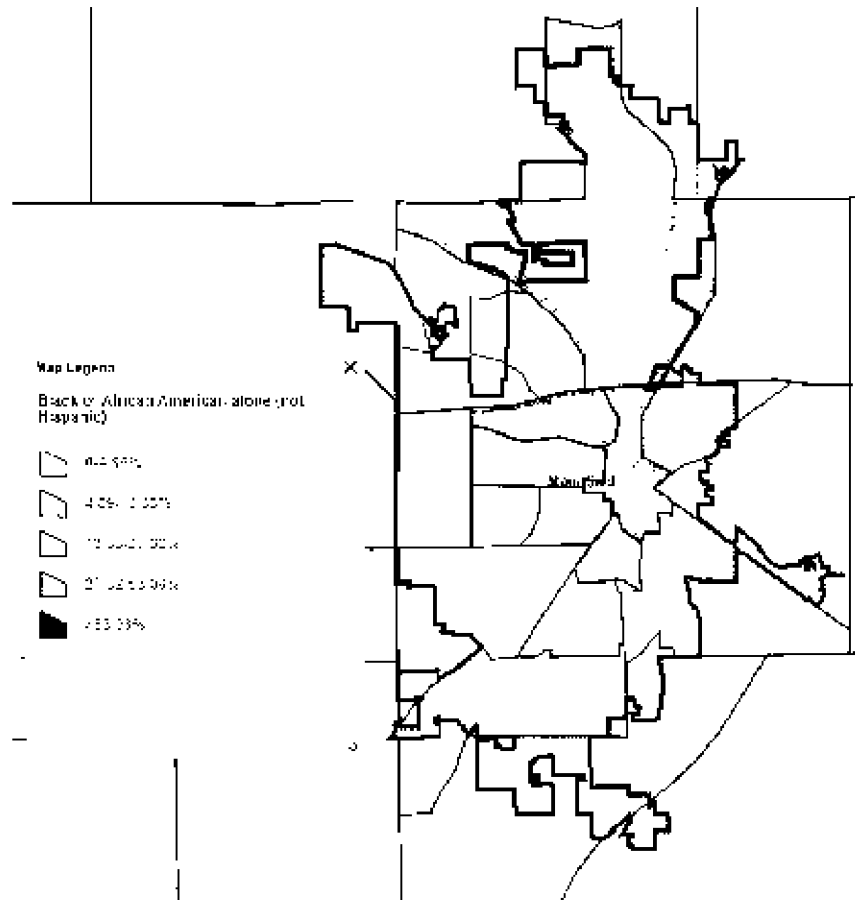
percentage of persons with severe housing problems be at least 10 percentage points higher than the percentage of persons in the racial/ethnic category as a whole. Therefore, this is not considered to be a statistically significant disproportionate impact.

Table 8: Households Exiting from Shelters and Rapid Rehousing to Permanent Housing

| Provider | Households exiting (all destinations) | Permanent Destinations - # of exits | Permanent Destinations - % of exits |
|--------------------------------------|---------------------------------------|-------------------------------------|-------------------------------------|
| Emergency Shelter | | | |
| Harmony House | 433 | 229 | 52.9% |
| Rapid Rehousing | | | |
| Harmony House | 17 | 17 | 100% |
| Catholic Charities Diocese of Toledo | 39 | 31 | 79.5% |
| Total | 489 | 277 | 56.6% |

Data is from the Ohio BOSCOC 2018 Quarterly Performance Report

Map 2: Geographic Distribution of the Black/African American Population in the City of Mansfield.



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

Based upon the 2010 Health Policy Institute of Ohio, profile of Family Violence in Richland County (see Graph 1). 73 adults sought shelter in domestic violence shelters in the County. However, also according to this profile, each year there are 2,001 reports of abuse or neglect filed with children's services; 147 children placed into custody; an estimated 980-1,300 adults are physically abused by a current or former intimate partner; 295 people that file petitions for civil protection orders; 134 reports filed of abuse, neglect, or exploitation of

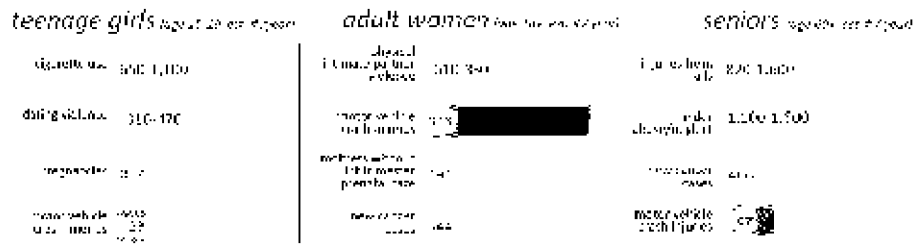
seniors. Therefore, housing needs are likely greater than the 73 adults seeking shelter annually.

As defined by the Victims of Trafficking and Violence Protection Act of 2000 (otherwise known as the Trafficking Victims Protection Act [TVPA]), human trafficking involves the use of force, fraud, or coercion to exploit another person through commercialized sex or involuntary labor. In cases involving minors, however, the use of force, fraud or coercion does not have to be present for the offense to be classified as sex trafficking because a minor cannot legally consent to commercial sex.

Obtaining Data on human trafficking at the County level has been challenging, but based upon estimates at the State level from various sources, the numbers could be significant. For example, the Ohio Network of Children's Advocacy Centers identified 242 victims who were minors in 2019; the Ohio Attorney General reported 307 victims in 2019, and according to The Ohio Human Trafficking Prevalence Study, Anderson, V. et al. 2019 <https://www.humantrafficking.ohio.gov/data-reports.html>, there were 1,078 American-born Ohio youth (aged 12 to 17) that were estimated to have been trafficked for sex over a one-year period.

Graph 1: Information from Richland County Profile from the Ohio Family Violence Protection Project

In Richland County, how does family violence compare to other threats among ...?



* This bar chart compares family violence to other threats among teenage girls, adult women, and seniors. Statistics include partner violence, intimate partner violence, child abuse, and injuries to children and adults.

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

HUD's definition of other populations requiring services or housing assistance to prevent homelessness is as follows -

Households (i.e., individuals and families) who:

- have previously been qualified as "homeless" as defined in 24 CFR 91.5

- are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and
- need additional housing assistance or supportive services to avoid a return to homelessness

This population is difficult to capture. However, we have identified the following populations that appear to be a fit for this category:

- In its 2018 Final Quarterly Performance Report covering the period 1/1/18 to 12/31/18 (the most recent information available), the Continuum of Care for the Balance of State in Ohio identified facilities operating as shelters, providing permanent housing solutions, and conducting rapid rehousing. These facilities had a total of 489 households exiting to all destinations (Table 8). Of those, 277 households (56.6%) were able to locate to permanent destinations. This left 212 households (44.4%) in need of a permanent housing solution. We recognize that this methodology allows for some double counting of households who entered and exited the shelter system more than once over the course of a year.

HUD's definition of other populations at greatest risk of housing instability is as follows - At Greatest Risk of Housing Instability means a household that has:

- Annual income \leq 30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
- OR
- Annual income \leq 50% of area median income and meets one of the conditions of "At risk of homelessness"

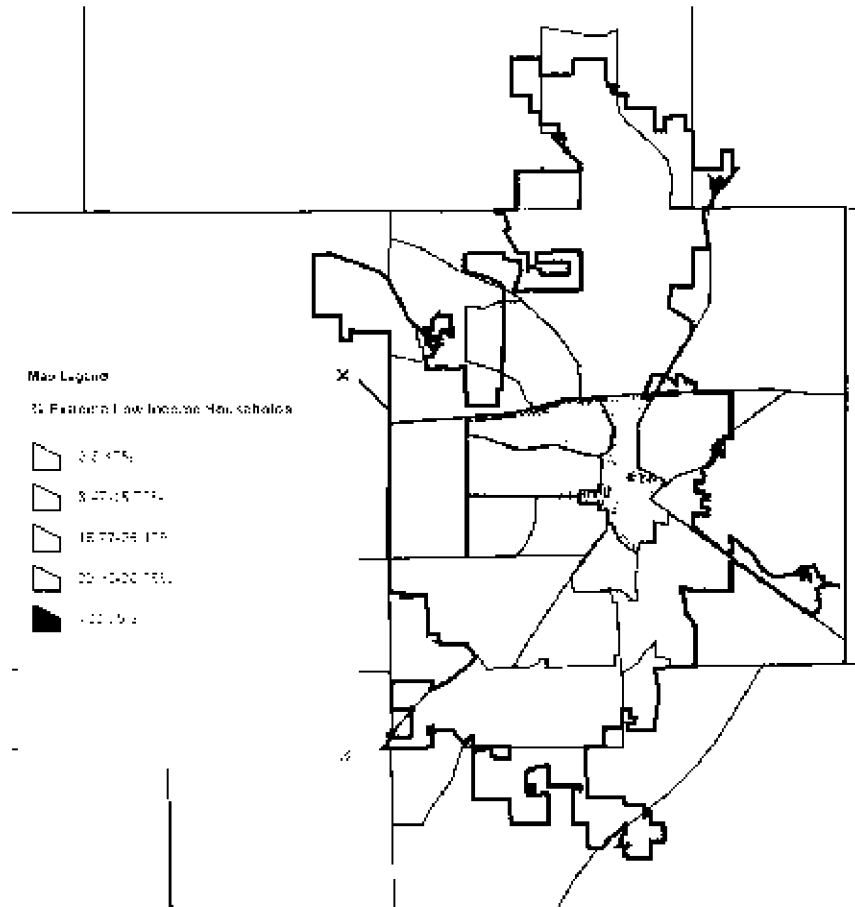
As identified in the City of Mansfield's current Consolidated Plan, there are 2,765 households in the City of Mansfield that are in the extremely low-income category. According to the HUD 2015 to 2019 Comprehensive Housing Affordability Strategy (CHAS) Data (the most recent available), 1,865 (67.5%) Extremely low Income (ELI) households were severely housing cost burdened, paying more than 50% of their income on housing, 1,475 of these households were renters, and 390 were owners.

For the second definition, we have no hard data to put into numbers, but we refer back to the numbers of people that enter shelters each year (around 500) as an indicator that there is a significant population at risk of homelessness.

Finally, we mention several other groups that should be considered here, as members of these groups certainly meet the qualifying population criteria:

- The first is veterans: As identified in the City's current Consolidated Plan, 9.5% of the population are veterans, who also typically have higher rates of disability.
- The second is formerly incarcerated persons: Richland County has multiple correctional facilities
- The third is those with disabilities: Based upon the 2017 ACS, 20.1% of the population of the City of Mansfield have a disability. This is high. For example, this compares to 13.6% for the State of Ohio.
- The fourth is persons with a mental health disorder: According to the Richland County Mental Health and Recovery Services Board, there are 6,359 persons experiencing mental illness in Richland County, including 2,947 children.
- The fifth is persons with an addiction disorder: According to the Richland County Mental Health and Recovery Services Board, there are 4,627 persons with a drug/alcohol addiction in Richland County, including 904 children.
- The sixth is older persons: In addition, 14% (52,872) of the total population are 65 and over. This population is particularly vulnerable, since they are more likely to have a low income, and the need for accessible housing further limits their housing choices. 17.9% of all households in the City are Householders over the age of 65 and living alone. As people within this age category are more likely than the general population to have financial constraints, physical disabilities, reduced cognitive functioning, and challenges with daily living tasks
- The seventh is female householders with no husband present: According to the 2020 ACS, 39.6% of all households in this category were below the poverty level compared with 24.5% of the general population. Even more pronounced, for families with a female householder, no husband present, with related children under 18 years, 54.2% were below the poverty level.

Map 3: Concentration of extremely low-income households in the City



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

There are a number of organizations addressing housing and service needs of these qualifying populations in the City of Mansfield and Richland County. For example, the Continuum of Care for the Balance of State shows data for each of the facilities providing shelter for homeless persons (see Table 9). According to the City's current Consolidated Plan, the Mansfield Metropolitan Housing Authority administers a total of 1,855 Housing Choice Vouchers to the

City of Mansfield and Richland County. The Housing Choice Voucher program allows assisted families a choice on where they would like to reside. There is no public housing within the City of Mansfield. There are, however, a number of multi-family Low Income Housing Tax Credit, and HUD Multi-family Housing Properties located within the City, as identified in Map 4.

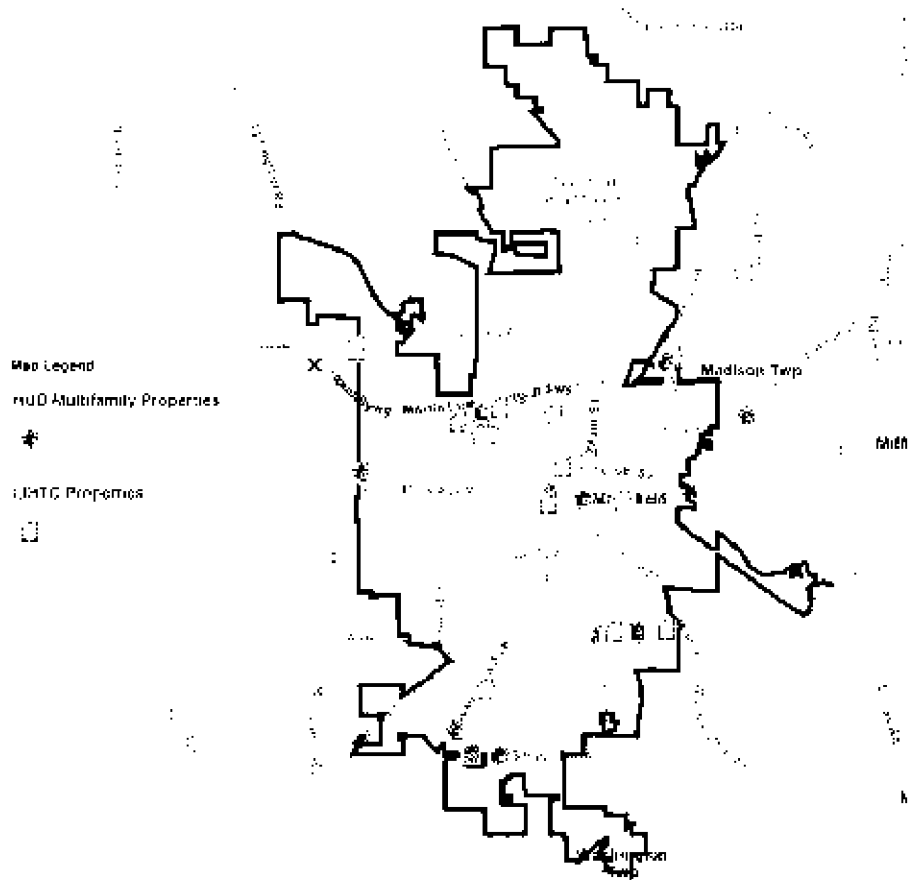
Several organizations provide services to these populations, and there are a variety of affordable and supportive housing resources. For further details on these organizations and the services that they provide, refer to the “Consultation” section of this Allocation Plan.

As identified in Table 2, there are 12 family housing units for emergency shelter, and 40 emergency shelter housing units for adults; there are 20 permanent supportive housing units for families, and 69 permanent supportive housing units for adults.

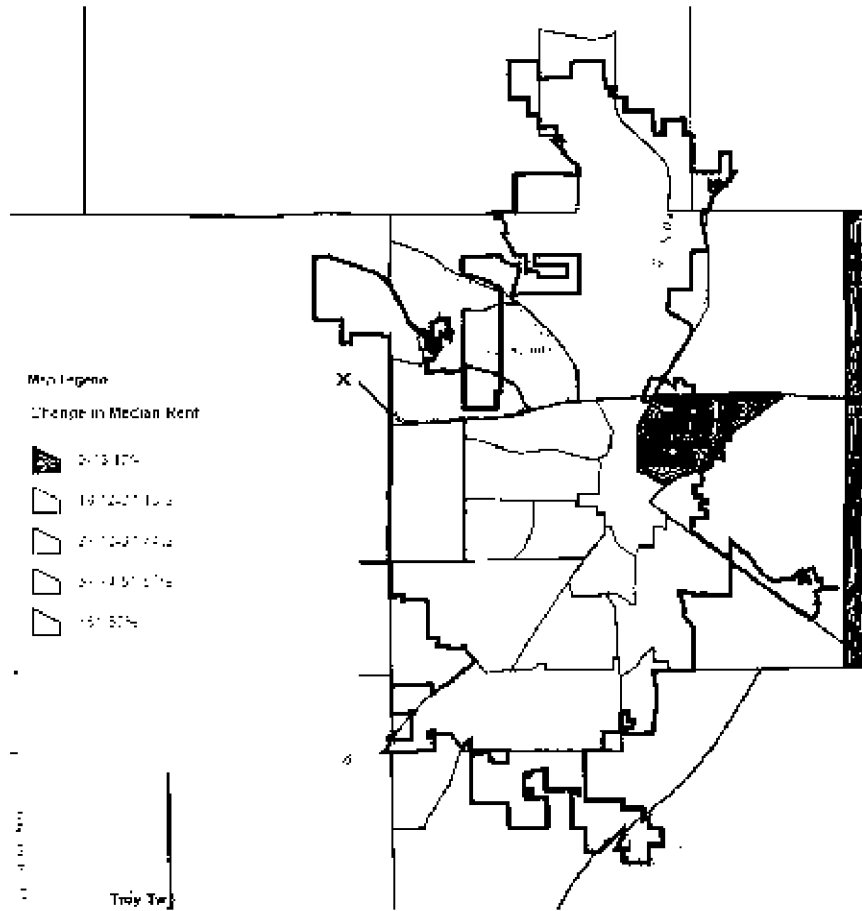
Table 9: Average length of stay in shelters.

| Name of Facility | Average Length of Stay in Days | Median Length of Stay in Days |
|--|--------------------------------|-------------------------------|
| Harmony House (Emergency Shelter) | 74.44 | 18 |
| Catholic Charities Diocese of Toledo (Rapid Rehousing) | 121.49 | 112 |
| Harmony House (Rapid Rehousing) | 59.54 | 53 |
| Average across facilities | 68.49 | 61 |

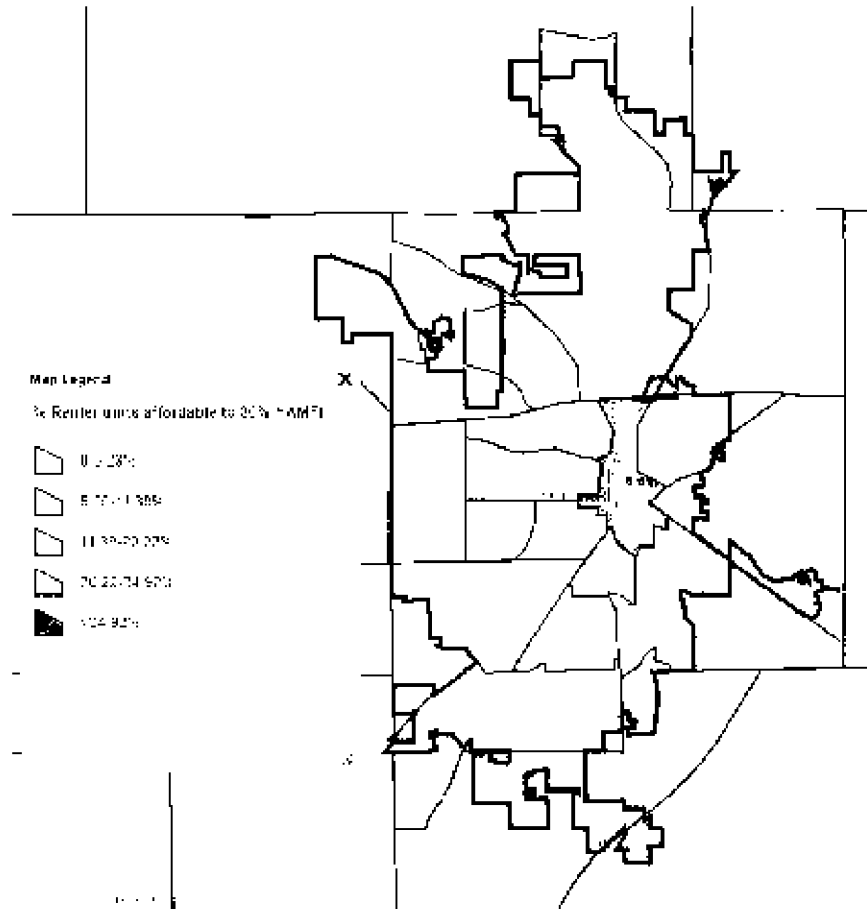
Map 4: LIHTC and HUD Multi Family Properties within the City of Mansfield



Map 5: Change in median rents across the City



Map 6: Dispersion of rental units affordable to very low income households.



Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

As shown on Table 2, there is an identified gap of 8 housing units (8 beds) for temporary housing for adults. One of the challenges is that people that are in temporary facilities time out, because there are limits to how long they can remain in a given facility. This is exacerbated by the fact that there are inadequate beds to house everyone in need. Some of the

persons that are in the shelters could be moved into permanent supportive housing if it was available. This would free up the beds for those needing temporary housing.

Regarding services, the service providers identified a significant need for case managers to assist persons with navigating a range of life circumstances. Service providers also noted that because there are specific requirements around those who qualify for services, that many people fall through the cracks, and there is a need to address the needs of this population too

At Risk of Homelessness as defined in 24 CFR 91.5

As shown on Table 2, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only. As described in the narrative under homelessness, moving some of the people in the shelters and other facilities into permanent supportive housing could help to open up beds for those without shelter

Once again, case management has been identified by the service providers as an important need. Adequate services need to be tied to the housing that will be provided, to ensure the success of those being housed. For example, they may need assistance with employment, childcare, transportation, counseling, and mental health and/or addiction services.

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

There is an unmet need for additional housing units. The County has experienced an uptick in domestic violence during and since the Covid pandemic. While it is difficult to estimate the number of units needed, the need appears to be significant, and growing.

This population also has a need for services such as employment, childcare, transportation, counseling, etc., including services associated with the organization providing the housing, in order for a more seamless coordination of needs.

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

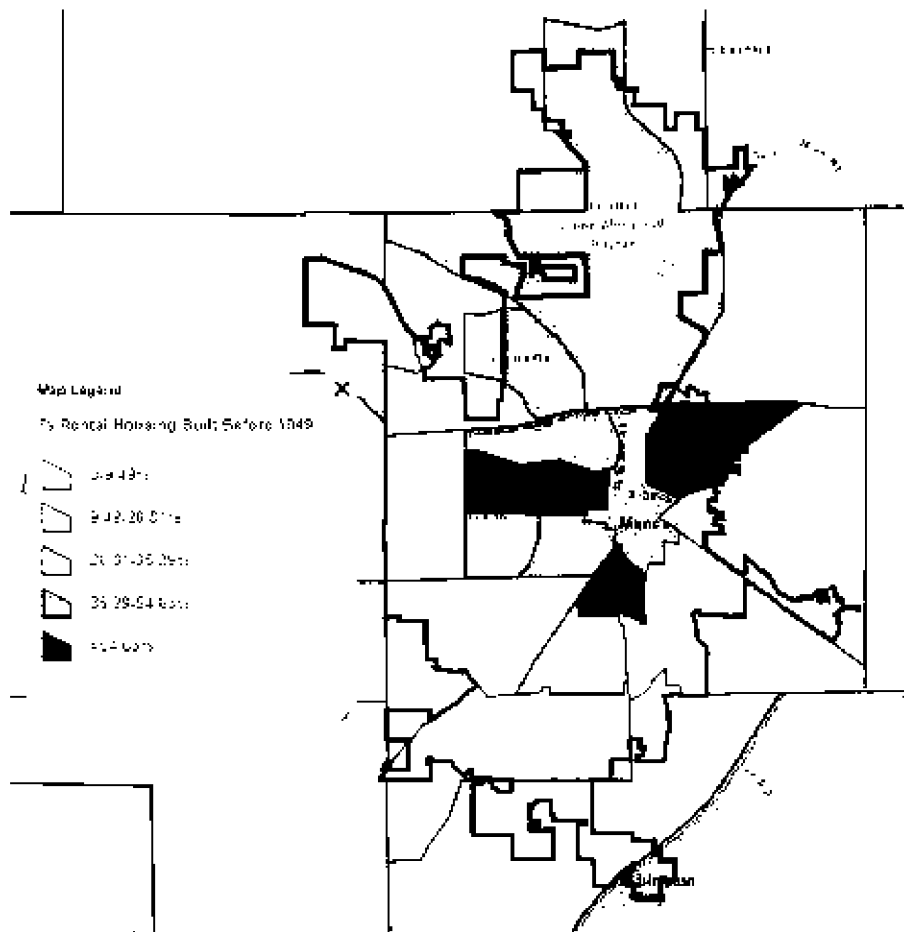
The needs of this group largely mirror the needs identified under "at risk of homelessness". As shown on Table 2, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only. As described in the narrative under homelessness, moving some of the people in the shelters and other facilities into permanent supportive housing could help to open up beds for those without shelter

Note that there is also a geographic component to the need, as identified in Maps 5, 6 and 7. In some cases there is a mismatch between identified need and availability of units in a given

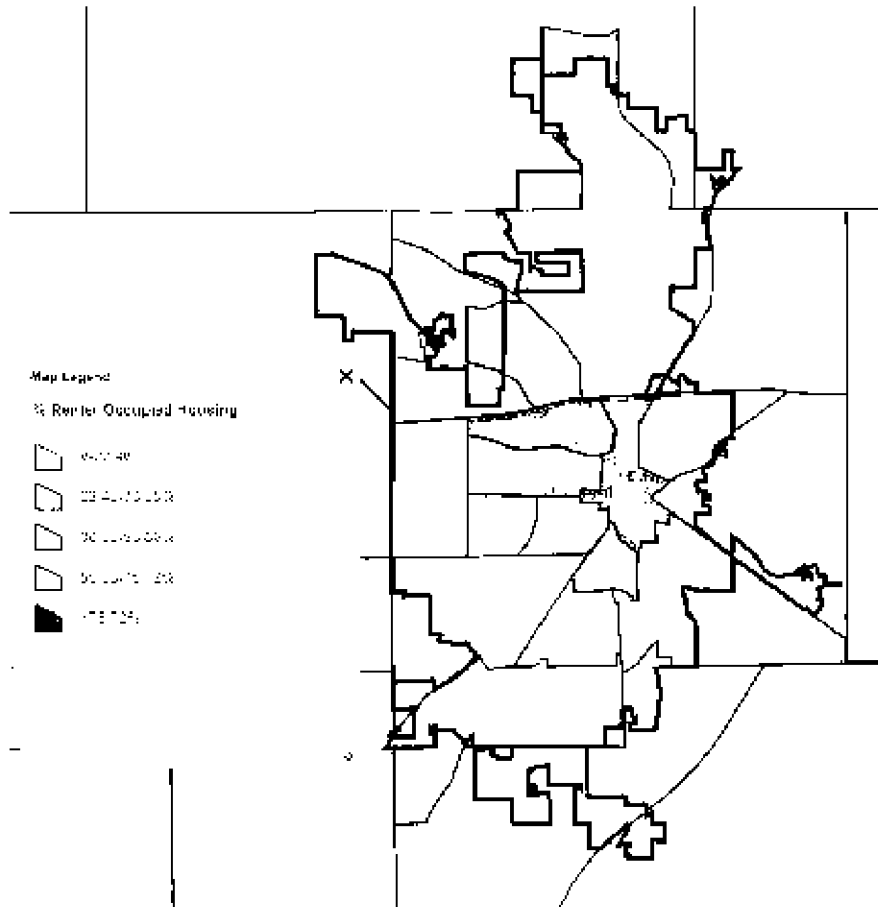
geographic part of the City. In addition, because much of the affordable housing stock is older (see map 7), the condition of the units also becomes an issue.

Case management has been identified by the service providers as a huge need. It is also important that there be adequate services tied to the housing that will be provided, to ensure the success of those being housed. For example, they may need assistance with employment

Map 7: Geographic dispersion of older rental units



Map 8: Concentration of renter occupied housing



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

For temporary housing, there is an identified gap of 8 housing units (9 beds) for temporary housing for adults. There is also a need for additional services for the homeless population, particularly case management, and assistance for those who may not qualify for existing services.

For permanent supportive housing, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only, plus additional units needed for victims of domestic violence. There is also a need for services tied to these additional housing units.

In addition, there are 1,475 renter households and 390 owner households below 30% AMI that are paying more than 50% of their income on housing. This means that many of our most vulnerable have little income left for groceries, medicine, and other life necessities. This is more representative of the true gap, and especially highlights the need for affordable housing that is earmarked specifically for this population. In other words, we need about 1,900 decent housing units that are affordable to households at or below 30% of area median income.

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

N/A

Identify priority needs for qualifying populations:

The priority needs identified by the City are as follows:

1. Additional permanent supportive housing units to be developed, allowing for persons in all qualifying populations to move from current temporary or unfit housing into permanent supportive housing. This will free up the space in the shelters and other facilities for those who are in need of temporary housing solutions (Q1)
2. Services tied to this supportive housing, to ensure that needs of the occupants are met, so that they can successfully stay in this housing. Also, services specifically for the homeless population (Q1) and the domestic violence population (Q3) to meet the needs of those who may fall through the gaps, and to provide for additional case management.
3. Support for nonprofit agencies to assist with capacity building and operating costs. These agencies are stretched thin by the needs of the qualifying populations which they are working to serve

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

The level of need was determined by a thorough review, including the following:

- First a quantitative analysis was done, using data from the US Census Bureau, the Balance of State Continuum of Care, the U. S Department of Housing and Urban Development CHAS, and local data from a variety of sources

- **Second**, a qualitative analysis was done based upon a meeting with the public and local stakeholders, and multiple interviews with local service providers.

It is our view that the combination of the quantitative data and the qualitative data is vital to good decision making. We tried to both understand what the numbers were telling us about need, and sought to really hear what the housing and service providers, the public and others who have a good understanding of the needs of this population were telling us. We think that this approach has led to some valid conclusions about priorities regarding need.

HOME-ARP Activities

Template:

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

In both cases, a competitive process will be followed:

For the housing component, Requests for Proposals will be provided to potential housing developers, and will be advertised on the City's website and in the local newspaper. The RFP will outline the requirements that must be met, and will be structured to ensure that high quality units are built in locations where they are needed. The RFP will outline the preferences that must be met. They will also outline the scoring criteria and the underwriting process that will be followed.

The RFPs for service providers will follow a similar process. The RFP will be provided to potential service providers, and will be advertised on the City's website and in the local newspaper. The RFP will outline the requirements that must be met, and will be structured to ensure that high quality and needed services will be provided. The RFP will outline the preferences that must be met. They will also outline the scoring criteria and the underwriting process that will be followed.

Describe whether the PJ will administer eligible activities directly:

The City of Mansfield will manage the competitive Request for Proposal process, and will ensure oversight of selected developers and service providers throughout the grant period, but will not undertake any activities directly.

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

N/A No subrecipient or contractor is responsible for the administration of the PI's entire HOME-ARP grant.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Table 11: Use of HOME-ARP Funding

| Activity Name | Anticipated Outcomes and Budget | Activity Description | Who will be Responsible to Administer Activity? | How will Organization Conducting Activity be Selected? | Eligible Population, Preferences ² |
|--|---|---|--|--|--|
| Development of Affordable Rental Housing | 17 units of permanent supportive housing \$650,000 | Creation of additional housing units affordable to LMI HUD tied to services needed by tenants. Units and services may or may not meet formal HUD definition of PSH, but will be awarded to identified needs within the City HOME-ARP funds will be leveraged & not more than 20% of the total funding | Organizations with capacity to develop and manage permanent supportive housing | Through a competitive RFP outlining the goals for the activity, the regulations governing it, the eligible population and allowable preferences, the activities or requirements, the scoring criteria, and other activity elements | LI households, all Qualifying Populations (QPs) No preferences |
| Supportive Services | 120 people assisted \$150,000 | Supportive services in three groupings <ul style="list-style-type: none"> One portion geared to meeting the needs of the homeless and domestic violence populations, and tied to the Non-Profit Capacity Building Activity. Includes supportive services such as housing search and placement, counseling, case management, and other services needed to support individuals and families seeking to stabilize their housing. The other portion is allocated to the proposed City affordable housing projects, and geared to the needs of their respective tenants. Includes supportive services such as counseling, job placement assistance, transportation, case management, and other services needed to support households living in assisted housing units. | Organizations with capacity to provide and manage needed supportive services | Through a competitive RFP outlining goals for the activity, regulations governing it, eligible population and allowable preferences, submission requirements, scoring criteria, and other activity elements | LI households, all QPs Preferences: \$75,000 for QP 1 and 3; \$75,000 tied to projects for all QPs (see note 1) |

| Activity Name | Anticipated Outcomes and Budget | Activity Description | Who will be Responsible to Administer Activity? | How will Organization Conducting Activity be Selected? | Eligible Population, Preferences? |
|---------------------------------|---------------------------------|---|---|---|---|
| Non-Profit Capacity Building | n/a \$92,665 | Develop the capacity of a local service provider to conduct case management and to assist individuals and households with needs related to stabilization and housing. This would be an extension of a pilot project conducted by the City to identify and assist unsheltered homeless by conducting frequent outreach. These funds would pay for up to 50% of the salary of a case worker to provide services to the qualifying population, up to the amount allocated. | Organizations seeking to further develop capacity to provide and manage needed supportive services. | Through a competitive RFP outlining the goals for the activity, the regulations governing it, the population to be assisted, the submission requirements, the scoring criteria, and other activity elements. The qualifying service provider will need to provide a plan for continuing to provide case management for the qualifying populations, once grant funds are exhausted. | This funding is for agencies awarded supportive services funding. |
| Non-Profit Operating | n/a \$50,000 | Provide non-profit operating support for one or more local agencies who are implementing HOME-ARR supportive service activities. | Organizations willing and able to provide staffing for HOME-ARR supportive service activities. | Through a competitive RFP outlining the goals for the activity, the regulations governing it, the population to be assisted, the submission requirements, the scoring criteria, and other activity elements. The qualifying service provider will need to provide a plan for continuing to provide staffing for supportive services for the qualifying populations, once grant funds are exhausted. | This funding is for agencies awarded supportive services funding. |
| City of Maricopa Administration | n/a \$128,293 | Admin. planning, program project oversight, closure, & monitoring. | City Staff | n/a | n/a |
| Total: | \$1,061,958 | | | | |

Leveraging of funds will be expected, and will be a scoring criteria for projects. Because of this, we anticipate that the total number of units will likely be significantly greater than the 12 units that can be funded with the funds allocated through this program. These could be new development or rehabilitation of existing units.

Qualifying Populations (QPs) are as follows:

- 1. Homeless*
- 2. At Risk of Homelessness*
- 3. Fleeing or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking*
- 4. Other Populations, which includes Other Families Seeking Services or Housing Assistance to Prevent Homelessness OR At Greatest Risk of Housing Instability*

It is anticipated that supportive services funding will be split, with \$75,000 as a preference to those that are homeless, victims of domestic violence, and/or in shelters (Q1) and 3, and \$25,000 supporting those living in the housing being developed, with no preferences.

Note: The funding from this program will be unable to completely fill the various needs identified in this plan. The City will need to determine how this gap can best be filled using other resources. This is beyond the scope of this plan.

Template:

Use of HOME-ARP Funding

| | Funding Amount | Percent of the Grant | Statutory Limit |
|--|-----------------------|-----------------------------|------------------------|
| Supportive Services | \$ 150,000 | | |
| Acquisition and Development of Non-Congregate Shelters | \$ 0 | | |
| Tenant Based Rental Assistance (TBRA) | \$ 0 | | |
| Development of Affordable Rental Housing | \$ 650,000 | | |
| Non-Profit Operating | \$ 50,000 | 4.71 % | 5% |
| Non-Profit Capacity Building | \$ 52,665 | 4.95 % | 5% |
| Administration and Planning | \$ 159,293 | 14.99 % | 15% |
| Total HOME ARP Allocation | \$ 1,361,958 | | |

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

HOME-ARP funds will be targeted to meet the priority needs as identified in the need assessment and gap analysis. The priority needs identified by the County are as follows:

1. Additional permanent supportive housing units to be developed, allowing for homeless persons (Q1), persons at risk of homelessness (Q2), persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking (Q3), and other populations (Q4) to move from current temporary or unsuitable housing into permanent supportive housing. This will free up the space in the shelters and other facilities for those who are in need of temporary housing solutions (Q1).
2. Services tied to this supportive housing, to ensure that needs of the occupants are met, so that they can successfully stay in this housing. Services specifically for the homeless population (Q1), to meet the needs of those who may fall through the gaps, and to provide for additional case management.
3. Support for nonprofit agencies to assist with capacity building and operating costs. These agencies are stretched thin by the needs of the qualifying populations which they are working to serve.

This parallels what we have laid out in our plan, budget, and activity allocation. Our first priority being housing, with some housing being developed for all four QP's.

Our second priority is services and case management, with an emphasis on those who will reside in the housing, or who may not get served with existing funding.

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

Because there was inadequate housing at all levels, but especially for the provision of permanent supportive housing solutions which addressed the needs of all QPs. This addresses another significant identified need, by allowing for those who would move from various facilities into the permanent housing solutions to free up the temporary housing for the Q1 (Homeless) population.

Also, in talking with the service providers, it became abundantly clear that any housing not tied to supportive services would likely be unsuccessful in meeting the needs of the population that is in need of this housing. These service providers also identified other gaps that needed additional funding in order to assist the homeless and other groups in navigating the system, and challenges brought on by the organizations providing the services being stretched thin, and needing support for their ongoing success.

HOME-ARP Production Housing Goals

Template

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

12 units of affordable housing are estimated to be built, using \$650,000 in funding, which will be leveraged with other dollars.

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

The production goal that we seek to meet is 12 units. Because we only have limited HOME-ARP dollars, and because our need for additional units is substantial (1,900 additional housing units are needed), we knew that we could not meet all of the need. It is anticipated that units will cost over \$300,000 each to produce, and they will also require a variety of services to be tied to the housing throughout the affordability period, at an additional expense to the developer. For the City funded projects, we are seeking to find a balance, by requiring that the HOME-ARP funding not exceed 20% of the total project funding. This allows us to leverage funds, but also provide a meaningful contribution of gap funding to the project. It also allows us to make a meaningful contribution to addressing our local housing need.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section IV.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

"Prioritization. In the context of the coordinated entry process, HUD uses the term "Prioritization" to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section II.D. of this Notice."

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.** For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

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

Yes, the supportive services activity will include a preference for one or more of the qualifying populations, as outlined in Table 11. The use of preferences will be as follows:

- Supportive Services will be split as follows: One portion, (\$75,000) of the funding will be with a preference to the homeless and domestic violence populations (QP1 and QP2), and will be geared toward meeting needs appropriate for this population. The remaining portion of supportive services (\$75,000) will be tied to the housing being developed, which will serve all qualifying populations with no preference.

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

The service providers identified specific gaps relative to the provision services and case management for homeless (QP1) and domestic violence (QP2) qualifying populations. By splitting the funds for services, we can serve these populations and also help to ensure that households moving into housing to be developed will get the services that they need, thereby serving all qualifying populations.

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

The housing to be developed, along with the services to be offered to tenants of this housing will all be open to all of the qualifying populations, thereby ensuring that all QPs have access to this funding to address their needs.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE.

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ must include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJs may use multiple referral methods in its HOME-ARP program. (Optional):

N/A

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

N/A

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

N/A

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

N/A

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

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

N/A

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

N/A

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

N/A

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.202(f). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- **Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity**
N/A
- **Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.**
N/A
- **State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.**
N/A
- **Specify the required compliance period, whether it is the minimum 15 years or longer.**
N/A
- **State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG**
N/A
- **Other requirements in the PJ's guidelines, if applicable:**
N/A