



# 2025 Action Plan

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CITY OF MANSFIELD, OHIO

Adrian Ackerman

PERMITTING AND DEVELOPMENT, CITY OF MANSFIELD | 30 N. DIAMOND ST MANSFIELD, OHIO 44902

## **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.

The City of Mansfield encouraged public participation through public meetings and a public hearing. The notification for the application period, and the planning timeline were published on December 20, 2024 with the website address to locate all information that was published on the City's website for the duration of the process. The first public meeting was held on January 8, 2025 at 5pm at the Mansfield Richland County Public Library. The second public meeting was held on January 10, 2025 at 2:00pm at the Mansfield Richland County Public Library. Notifications about each meeting were e-mailed to City elected officials, and sub-recipients to encourage public participation. The public hearing was held on February 18, 2025 at 6:20pm to discuss applications for funding and gain additional public input. Additional meetings were held at City Council to discuss funding availability and recommendations on March 10, 2025; March 18, 2025; and April 1, 2025. On April 1, 2025 City Council approved final awards. The Action Plan Draft was made available on the City Website on April 10, 2025, as well as made available in person, and published in the local news paper for public review on April 16, 2025. The Action Plan Draft was available through the submission of the final plan (approx June 30, 2025).

### **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.

No Comments recieved

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

No comments Recieved

## **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

Ms. Adrian Ackerman, Permitting and Development Director, City of Mansfield. 30 North Diamond Street, 3rd Floor, 44902 Phone: 419.755.9795  
aackerman@ci.mansfield.oh.us

## **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	<b>Agency/Group/Organization</b>	Mansfield Metropolitan Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Mansfield Metropolitan Housing Authority is a continual partner with the City of Mansfield in identifying and creating solutions for housing needs.
2	<b>Agency/Group/Organization</b>	City of Mansfield
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs Homelessness Strategy Market Analysis Economic Development Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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	<b>Agency/Group/Organization</b>	CATHOLIC CHARITIES
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Elderly Persons Services-Persons with Disabilities Services-homeless Services-Health Services-Employment Service-Fair Housing Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	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**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
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	<a href="https://www.rcrpc.org/housing">https://www.rcrpc.org/housing</a> 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 recieved 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 recieved 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 recieved regarding this public meeting or information provided.		

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 programs.</p>	No comments were recieved during this hearing.		
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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 recieved 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 recieved.		

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

#### 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	858,204.00	133,106.94	1,051,428.01	2,042,738.95	2,220,000.00	PI \$27,246.51 RLF 105,680.43

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	329,092.36	74,280.74	900,101.92	1,303,475.02	1,000,000.00	

**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
<b>1</b>	Improve, Maintain, and Expand Affordable Housing	2024	2028	Affordable Housing Homeless	City-Wide	Housing and Homelessness	CDBG: \$248,653.16 HOME: \$1,032,346.99	Rental units constructed: 4 Household Housing Unit Rental units rehabilitated: 1 Household Housing Unit Direct Financial Assistance to Homebuyers: 3 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 12 Households Assisted
<b>2</b>	Increase Economic Opportunities	2024	2028	Non-Housing Community Development	City-Wide	Economic Opportunities	CDBG: \$105,680.43 HOME: \$0.00	Jobs created/retained: 10 Jobs Businesses assisted: 1 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Neighborhood Revitalization	2024	2028	Non-Housing Community Development	West End Neighborhood	Public Improvements West End Neighborhood	CDBG: \$1,388,033.96 HOME: \$.00	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 500 Households Assisted Housing Code Enforcement/Foreclosed Property Care: 50 Household Housing Unit
4	Provide Needed Public Services	2024	2028	Non-Homeless Special Needs Non-Housing Community Development	CDBG Eligible Census Tracts City-Wide	Public Services	CDBG: \$128,730.60 HOME: \$.00	Other: 400 Other
5	Homelessness Prevention	2024	2028	Affordable Housing Homeless	City-Wide	Housing and Homelessness	HOME: \$238,218.79	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	CDBG: \$171,640.80 HOME: \$32,909.24	Other: 1 Other

**Table 6 – Goals Summary**

## Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Improve, Maintain, and Expand Affordable Housing
	<b>Goal Description</b>	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.
<b>2</b>	<b>Goal Name</b>	Increase Economic Opportunities
	<b>Goal Description</b>	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.
<b>3</b>	<b>Goal Name</b>	Neighborhood Revitalization
	<b>Goal Description</b>	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	<b>Goal Name</b>	Provide Needed Public Services
	<b>Goal Description</b>	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	<b>Goal Name</b>	Homelessness Prevention
	<b>Goal Description</b>	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	<b>Goal Name</b>	Planning and Program Administration
	<b>Goal Description</b>	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

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	TBRA
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	<b>Project Name</b>	CDBG Administration
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Planning and Program Administration
	<b>Needs Addressed</b>	Planning
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Administration of the CDBG program, 20% of 2025 allocation \$171,640.80
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This funding will be used to support administration and planning for all activities
	<b>Location Description</b>	Planning and administration only
	<b>Planned Activities</b>	Planning and administration
2	<b>Project Name</b>	Targeted Code Enforcement
	<b>Target Area</b>	CDBG Eligible Census Tracts
	<b>Goals Supported</b>	Neighborhood Revitalization
	<b>Needs Addressed</b>	West End Neighborhood
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Targeted code enforcement within census tract 5 is funded with 2.03% of the 2025 grant allocation for \$17.396.03
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated 1000 households will benefit from targeted code enforcement, by eliminating blight throughout the census tract
	<b>Location Description</b>	Census tract 5
	<b>Planned Activities</b>	Targeted Code enforcement
3	<b>Project Name</b>	Emergency Repair
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Improve, Maintain, and Expand Affordable Housing

	<b>Needs Addressed</b>	Housing and Homelessness
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Emergency Repair funding 8.92% of 2025 grant allocation \$76,542.52 and \$172,110.64 prior year remaining funds. Total funding \$248,653.16
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated this funding can assist 15 homeowners with emergency repairs
	<b>Location Description</b>	Emergency repair funding is available City Wide for eligible homeowners
	<b>Planned Activities</b>	Emergency repair activities for eligible homeowners to ensure decent, safe, and sanitary conditions
<b>4</b>	<b>Project Name</b>	West End Target Area
	<b>Target Area</b>	West End Neighborhood
	<b>Goals Supported</b>	Neighborhood Revitalization
	<b>Needs Addressed</b>	West End Neighborhood
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	West End Target Area Infrastructure 2025 grant allocation 54.05%, \$463,894.05 Prior year allocations \$906,743.88 Total- \$1,370,637.93
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The West End Target Area sits within Census tract 5, a qualified census tract, and it is estimated 1000 families will be provided improved infrastructure benefits
	<b>Location Description</b>	West End Target Area, within Census tract 5
<b>5</b>	<b>Planned Activities</b>	Infrastructure improvements including sidewalks, ADA Accessibility, crosswalks, lighting, and beautification
	<b>Project Name</b>	Economic Development RLF
	<b>Target Area</b>	City-Wide

	<b>Goals Supported</b>	Increase Economic Opportunities
	<b>Needs Addressed</b>	Economic Opportunities
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Economic Development 100 of RLF available- Approx \$105,680.43
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated this funding could create 8 FTE jobs
	<b>Location Description</b>	City Wide
	<b>Planned Activities</b>	Economic Development Loans
6	<b>Project Name</b>	Public Services
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Provide Needed Public Services
	<b>Needs Addressed</b>	Public Services
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Provide needed public services through various local agencies, costs not to exceed 15% of 2025 grant allocation \$128,730.60
	<b>Target Date</b>	6/26/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	All programs will serve low/mod income individuals and families.
	<b>Location Description</b>	Public service activities will be provided City-Wide to eligible residents.
7	<b>Planned Activities</b>	Public Services for 2025 include Door-to-Door transit, food banks, emergency subsistence program, childrens summer program, child care assistance, and other food insecurity programs.
	<b>Project Name</b>	HOME Administration
	<b>Target Area</b>	City-Wide

	<b>Goals Supported</b>	Planning and Program Administration
	<b>Needs Addressed</b>	Planning
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	HOME Program administration not to exceed 10% of 2025 grant allocation \$32,909.24
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This funding is for planning and administration
	<b>Location Description</b>	City wide planning and administration
	<b>Planned Activities</b>	Planning and administration
8	<b>Project Name</b>	CHDO Set-Aside
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Improve, Maintain, and Expand Affordable Housing
	<b>Needs Addressed</b>	Housing and Homelessness
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Required CHDO set aside, 15% of 2025 grant allocation (\$49363.85) plus remaining prior year CHDO set aside Total \$333,601.22
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated the CHDO funding available could assist 3 qualified families with housing. The City of Mansfield does not currently have an approved CHDO organization.
	<b>Location Description</b>	City Wide availability
9	<b>Project Name</b>	Homeowner Rehabilitation
	<b>Target Area</b>	City-Wide

	<b>Goals Supported</b>	Improve, Maintain, and Expand Affordable Housing
	<b>Needs Addressed</b>	Housing and Homelessness
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Homeowner Rehabilitation 33% of 2025 grant allocation \$108600.48
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	The City would be able to complete 1-2 homeowner rehabilitation projects with this funding.
	<b>Location Description</b>	Rehabilitation is eligible to income qualified homeowners City-Wide
	<b>Planned Activities</b>	The City of Mansfield will make funding available to fully rehabilitate owner occupied homes
<b>10</b>	<b>Project Name</b>	TBRA
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Homelessness Prevention
	<b>Needs Addressed</b>	Housing and Homelessness
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Tenant Based Rental AssistanceThe Shelter- Award 42% of 2025 grant allocation \$138,218.79Additional funding of \$100,000 available for use from prior year carryover
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	TBRA is estimated to assist 25 individuals and families with decent, safe, and sanitary housing
	<b>Location Description</b>	Funding will be available City-Wide
	<b>Planned Activities</b>	Primary activity is to assist victims of domestic violence with rental assistance to obtain and maintain independence.
<b>11</b>	<b>Project Name</b>	Down Payment Assistance
	<b>Target Area</b>	City-Wide

	<b>Goals Supported</b>	Improve, Maintain, and Expand Affordable Housing
	<b>Needs Addressed</b>	Housing and Homelessness
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Down Payment Assistance program \$62,500 of prior year carry over
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated Down Payment assistance could assist 5 eligible families.
	<b>Location Description</b>	Assistance is available City-Wide
	<b>Planned Activities</b>	Down Payment assistance up to \$10,000 towards home purchase in City limits.
<b>12</b>	<b>Project Name</b>	Homebuyer Development
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Improve, Maintain, and Expand Affordable Housing
	<b>Needs Addressed</b>	Housing and Homelessness
	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Homebuyer Development - Prior year carryover funding \$127,645.29
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated this funding could develop 1 home for an eligible homebuyer.
	<b>Location Description</b>	Activity will be eligible City Wide
<b>13</b>	<b>Planned Activities</b>	Develop one affordable home
	<b>Project Name</b>	Rental Development
	<b>Target Area</b>	City-Wide
	<b>Goals Supported</b>	Improve, Maintain, and Expand Affordable Housing
	<b>Needs Addressed</b>	Housing and Homelessness

	<b>Funding</b>	CDBG: \$2,042,738.95 HOME: \$1,303,475.02
	<b>Description</b>	Rental Development Activities- Prior year funding and Program income total \$400,000
	<b>Target Date</b>	6/30/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated this funding could create 4-5 HOME rental units.
	<b>Location Description</b>	Funding will be available City Wide for eligible development applicants
	<b>Planned Activities</b>	Funding will be available to assist in the development of 4-5 affordable rental housing units for eligible tenants.

## **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**

<b>Target Area</b>	<b>Percentage of Funds</b>
CDBG Eligible Census Tracts	
Mansfield City Corridors	
City-Wide	33
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**

The City of Mansfield will allocate a significant portion of the 2025 allocation to the West End Neighborhood, in an effort to construct phases 2 and 3 during the program year. The remainder of 2025 funds will be for various eligible uses City-Wide.

## 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
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

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

# Citizen Participation Comments



**CITY OF MANSFIELD**  
**JODIE A. PERRY, MAYOR**  
 30 N. DIAMOND STREET  
 MANSFIELD, OHIO 44902  
 419-755-9626  
[www.ci.mansfield.oh.us](http://www.ci.mansfield.oh.us)  
**Adrian Ackerman, Director**  
 419-755-9793



2025 Action Plan Timeline Community Development Block Grant/ HOME Program			
DATE	TIME	ACTION	LOCATION
January 1, 2025	8:00 AM	APPLICATION OPENS	<a href="https://ci.mansfield.oh.us/community-development/">https://ci.mansfield.oh.us/community-development/</a>
January 8, 2025	5:00 PM	PUBLIC MEETING	Mansfield Richland County Public Library- 43 W Third St- Community Room
January 10, 2025	2:00 PM	PUBLIC MEETING	Mansfield Richland County Public Library- 43 W Third St- Community Room
February 1, 2025	5:00 PM	APPLICATION CLOSES	Applications close, must be submitted via Neighborly or received via e-mail prior to 5pm. Applications submitted via hard copy MUST be submitted in person prior to 4pm, or be delivered to the office prior to 4pm. Mansfield City Council ***
February 18, 2025	6:30 PM**	PUBLIC HEARING	
March 10, 2025	4:00 PM	Action Plan Draft	Action Plan Draft and finding recommendations made available to the public and provided to City Council Mansfield City Council ***
March 18, 2025	6:30 PM **	Public Affairs Committee	Mansfield City Council ***
April 1, 2025	7:00 PM	City Council Vote	<a href="https://ci.mansfield.oh.us/community-development/">https://ci.mansfield.oh.us/community-development/</a> / Mansfield News Journal Notice Publication
April 11, 2025	4:00PM	Public Comment Period Open- 30 Days	
May 15, 2025	4:00 PM	ACTION PLAN DUE TO HUD	
July 1, 2025	2025 Program Year Begins		

\*\* Time may be subject to change based on City Council scheduling needs. These times are approximate and applicants will be notified of actual times once the Council schedule is finalized.  
 \*\*\* City Council Chambers is under renovation; location will be confirmed prior to meeting. Alternate Council meeting location is Classroom 1 in the Mansfield Municipal Courts



## Order Confirmation Not an Invoice

Account Number:	1649848
Customer Name:	City Of Mansfield - Comm Dev
Customer Address:	City Of Mansfield - Comm Dev 30 N Diamond St Richard Koehler Mansfield OH 44902-1702
Contact Name:	Adrian Ackerman
Contact Phone:	4197559793
Contact Email:	oackerman@ci.mansfield.oh.us
PO Number:	

Date:	12/12/2024
Order Number:	10854691
Prepayment Amount:	\$ 0.00

Column Count:	2.0000
Line Count:	19.0000
Height In Inches:	3.0000

Product	#Insertions	Start - End	Category
MNJ Mansfield News Journal	1	12/28/2024 - 12/28/2024	Public Notices
MNJ mansfieldnewsjournal.com	1	12/28/2024 - 12/28/2024	Public Notices

As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save!

Total Cash Order Confirmation Amount Due	\$129.80
Tax Amount	\$0.00
Service Fee 3.99%	\$5.18
Cash/Check/ACH Discount	-\$5.18
Payment Amount by Cash/Check/ACH	\$129.80
Payment Amount by Credit Card	\$134.98

Order Confirmation Amount Due: \$129.80

Ad Preview

City of Mansfield Community Development  
Notice of Funding Availability/ Request for Proposals

The City of Mansfield is announcing its 2025 Program year for CDBG and HOME funds. Estimated amounts: CDBG - \$850,000 HOME-\$350,000. Additional unused funding from previous years will be available for re-allocation. Applications will be accepted January 1, 2025- February 1, 2025 @ 5pm.

Eligible use, as well as applications, Neighborly application portal, and the full planning timeline will available on our website at <http://www.ci.mansfield.oh.us/departments-sp-783975672/community-development.html> or by e-mailing [aackerman@ci.mansfield.oh.us](mailto:aackerman@ci.mansfield.oh.us) on or before January 1, 2025. Public Meetings regarding use of funds, and instructions for the Neighborly Portal will be held at the Mansfield Richland County Main Library at 43 W 3rd St in the Community Room on January 8, 2025 @ 5:00pm and on January 10, 2025 @ 2:00pm.

(MNJ,Dec20,'24#10854691)

2/2



Order Confirmation

Not an Invoice

Account Number:	1549848
Customer Name:	City Of Mansfield - Comm Dev
Customer Address:	City Of Mansfield - Comm Dev 28 N Diamond St Richland Kachel Mansfield OH 44902-1702
Contact Name:	Adrian Ackerman
Contact Phone:	4197559793
Contact Email:	aackerman@ci.mansfield.oh.us
PO Number:	

Date:	04/07/2025
Order Number:	11221637
Prepayment Amount:	\$ 0.00

Column Count:	2.0000
Line Count:	32.0000
Height in Inches:	3.3300

Product	#Insertions	Start - End	Category
MNJ Mansfield News Journal 1		04/16/2025 - 04/16/2025	Public Notices
MNJ mansfieldnewsjournal.com	1	04/16/2025 - 04/16/2025	Public Notices

As an incentive for customers, we provide a discount off the total order cost equal to the 3.99% service fee if you pay with Cash/Check/ACH. Pay by Cash/Check/ACH and save!

Total Cash Order Confirmation Amount Due	\$210.40
Tax Amount	\$0.00
Service Fee 3.99%	\$8.39
Cash/Check/ACH Discount	\$8.39
Payment Amount by Cash/Check/ACH	\$210.40
Payment Amount by Credit Card	\$218.79

Order Confirmation Amount Due: \$210.40

1/2

Ad Preview

**DRAFT ANNUAL ACTION PLAN FOR PUBLIC REVIEW**  
The City of Mansfield Annual Action Plan is the planning document that addresses the community development and public service needs throughout the City of Mansfield.

The Draft Annual Action Plan will be submitted to the U.S. Department of Housing and Urban Development (HUD) on or about May 15, 2025, pending further HUD guidance. The funds distributed within the Entitlement Program are to benefit low to moderate income persons.

The City of Mansfield will make the Draft Consolidated Plan and Annual Action Plan available for public review for a period of thirty (30) days. Written comments must be received by May 14, 2025 to be considered. The Draft Annual Action Plan can be reviewed from April 11, 2025 through May 14, 2025 at the following location:

City of Mansfield, Permitting and Development- 30 North Diamond Street FL3 Mansfield, Ohio 44902

Online: <https://ci.mansfield.oh.us/community-development/> under 2025 Annual Planning

Comments should be submitted in writing to the Permitting and Development division, or via e-mail at [ackerman@ci.mansfield.oh.us](mailto:ackerman@ci.mansfield.oh.us)

The City of Mansfield will provide assistance to persons with disabilities, needing interpreters, or other auxiliary aids and services in order to participate in the planning and comment process. Any request for such assistance must be made no later than 72 hours in advance of the deadline, by contacting the Permitting and Development Division at (419)755-9793.

Adrian Ackerman  
Permitting and Development Director  
(MNJ, April 16, 2025 #11221637)

2/2

Ackerman, Adrian

From: Weiner, Delaine  
Sent: Thursday, February 13, 2025 2:05 PM  
To: City - All E-Mail Users  
Cc: Barent Thomas; Brenda Collins; Carl Hunsell; Cotton Uley; Converse, Director Kelly; Corley, Byron; Daley, Antoinette; Davis, A. Troyce; Donna West; Torrance, Deb; Mounts; Dennis; Diaz, Aurelio; Donald Nurdley; Gorman, Tina; Harpaz, Reilly; J Van Hartlingen; James-Ross, Latoria; Jamie Thompson; Jess WAMFD; Jodie Dees; Josh Keahler; Kim; Morton; Laura Burns; Madden W. David; Margie Ford; Mark Canidit; Matt Stansfield; Napier, A/C Michael; News Journal; Perry, Mayor; Jodie; Richard Sources; Sarah Russell; Shoup, Julie; Stephanie Zader; Susan Gentile; Suzi Besson; Wugler, Matthew; Yockey, Amy  
Subject: 2/10/25 - Pending Legislation - Summary - Meeting Schedule  
Attachments: Delaine Weiner.docx; Pending Legislation 2-10-25.pdf

February 13, 2025

Please see the attached pending legislation for **Tuesday, February 18<sup>th</sup>, 2025** or you can read it here online==>  
<https://ci.mansfield.oh.us/legislation/>

**Committee Meetings**

**Public Hearing - 6:20pm CDBG/ Home Applicants**

\* All meetings are public meetings. If you want to attend in person we are at the Mansfield City Building, 30 N. Diamond St, Mansfield OH 44902.

Please park in the upper lot off of Park Ave and enter in through the 2<sup>nd</sup> floor court room door.

Due to construction in Council Chambers all council meetings will be held in Court Room 1 until further notice.

**\*\*\*\*\* PLEASE NO FOOD OR DRINKS IN THE COURT ROOM \*\*\*\*\***

Also due to construction we will not be live streaming the Council meetings until we are back in our Council Chambers. We apologize for that inconvenience. Everyone is welcome to come watch them in person if your able to.

If anyone has any public comments, please email [citycouncil@ci.mansfield.oh.us](mailto:citycouncil@ci.mansfield.oh.us).

**INTRODUCTION**

The 2024-2028 Consolidated Plan is a collaborative process through which the community identifies its housing, homeless and community development needs; and establishes a vision, goals and strategies for achieving these needs. The plan also pinpoints how the money received from the U.S. Department of Housing and Urban Development (HUD) will be utilized over the upcoming program year—taking into account the regulations governing these programs—to meet locally recognized needs.

The City of Mansfield is required by law to have a detailed Citizen Participation Plan that contains the City's policies and procedures for public involvement in the *Consolidated Plan* process, and the use of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and any other community development need monies granted to the City by HUD. The Citizen Participation Plan must be available to the public.

Citizen participation is a vital part of the *Consolidated Plan* process. Citizens, non-profit organizations and other interested parties must be afforded adequate opportunity to participate in the planning process. This includes:

- Access to meetings
- Access to information
- Technical assistance as required
- Opportunity to comment on plans
- Public hearings to identify housing, community development needs and a review of proposed expenditures of funds, and
- Timely response to complaints and grievances.

The following describes the guiding principles for citizen participation by the *City of Mansfield* in the implementation of the *HUD Consolidated Plan*.

**Encouraging Public Participation**

The law requires that our *Citizen Participation Plan* both provide for and encourage public involvement, emphasize involvement by low to moderate-income people—especially those living in low to moderate-income neighborhoods, and provide the opportunity for involvement at each planning stage. Also, the U.S. Department of Housing and Urban Development (HUD) anticipates that the City of Mansfield will take actions that are appropriate to encourage participation by minorities, non-English speaking individuals, and people with disabilities.

Copies of this *Citizen Participation Plan*, as well as summaries of basic information about CDBG and HOME, and the *Consolidated Planning* process may be made available in the languages of residents who comprise a significant portion of the low to moderate income population. Currently, the City of Mansfield has materials in English only. Residents needing resources in other languages are welcomed to contact City staff.

**Summary February 18th, 2025****Committee Meeting****Public Hearing - 6:20pm CDBG/ Home Applicants**

Bill	Status	Title	Sponsor	Committee Meeting
<b>COUNCIL BEGINS</b>				
25-016	Vote	Assenting to the Petition for detachment of certain land from the City of Mansfield, Ohio, pursuant to the Ohio Revised Code 160.38, and declaring an emergency.	Mount	
<b>CAUCUS BEGINS</b>				
25-020	Caucus Only	Amending Chapter 1371 "Housing Code" Section 1371.13 "Violations" of the Mansfield Codified Ordinances and, declaring an emergency.	Mount	
25-021	Vote	Amending Sections 15, 16, and 31 of Ordinance No. 25-005 adopting personnel positions, pay grades, and salaries for certain employees of the City of Mansfield 2025 payroll year, and declaring an emergency.	Meier	
25-022	Caucus Only	Authorizing the Public Works Director to enter into an agreement for electric services aggregation with a credible electric company; and declaring an emergency.	Burns	
25-023	Caucus Only	Authorizing the Public Works Director to enter into a Brownfield Remedial Agreement with the Richland County Land Reutilization Corporation, Approving the expenditure of up to Ninety-One Thousand Eight Hundred Sixty-Eight and 35/100 Dollars (\$91,868.35) as match funding from the PRIDE Demolition Fund (#238) for the remediation of a former Gas Station at 474 Bowman Street, Mansfield, Ohio, 44903, and declaring an emergency.	Falkenstein	

**NEXT MEETING Tuesday, March 4th, 2025 7:00 Council to follow**

### Mansfield Citizen Participation Activities

The City of Mansfield Citizen Participation activities may include:

- Community Outreach
- Public Meetings
- Public Hearing
- Access to Information
- Technical Assistance
- Timely response to Complaints and Grievances

#### Community Outreach

In order to assure that all citizens have ample opportunity to participate in the planning process, the City of Mansfield will conduct a community outreach on the development of the strategic plan. The purposes for the outreach will be to:

- Obtain views of citizens, public agencies and other interested parties.
- When applicable, announce the availability of technical assistance and funds.
- Respond to proposals and comments at all stages of the Consolidated Plan submission process, including:
  - Identifying housing and community development needs
  - Reviewing proposed uses of funds
  - Reviewing program performance

**Public Meetings for the Annual Action Plan process will be held via zoom and in person.**

#### Public Meetings/ Hearings

The City of Mansfield will host two (2) public meetings each year. Typically, one of these meetings may consist of either: 1) a meeting to announce the availability of technical assistance and funding for current program year; 2) a meeting to review program performance; or 3) one of the city council meetings, where legislation regarding either the strategic plan or the annual action plan is read and/or considered for approval. Also, each year, a final public comment period will be held once the draft plan is complete, to solicit comments on the strategies and proposed use of funds. Public Meetings will be conveniently and located for people who will benefit from program funds, and will be accessible to persons with special needs.

One public hearing will be held during City Council, they may be held via zoom, and broadcast on the City of Mansfield's Facebook page and website. Agencies with proposals may also attend City Council in person. City Council will also hold a Public Affairs Committee meeting during the planning process to discuss recommendations for use of funding, and the Action Plan. Citizens

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### The Purpose of Participation

The primary purpose of the programs covered by this *Citizen Participation Plan* is to improve communities by providing:

- Decent Housing
- Suitable living environment
- Economic growth opportunities

Because of the amount of federal CDBG and HOME program monies the City of Mansfield receives each year is mostly based upon the severity of both poverty and *substandard housing conditions* in Mansfield; it is necessary that low to moderate-income residents who experience these conditions get involved with the planning process. Genuine involvement by these residents must take place at all stages of the process, including:

- Identifying needs
- Setting priorities among these needs, suggesting how much money should be allocated to each high-priority need, and suggesting the types of programs to meet high-priority needs
- Overseeing the way in which programs are carried out

### The Various Stages of the Consolidation Plan Process

The policies and procedures in the *Citizen Participation Plan* relate to several stages of actions mentioned in law or regulation. In general, these stages or events include:

- Identification of housing and community development needs
- Preparation of a draft usage of funds for the upcoming year called the proposed "Annual Action Plan" or the development of a proposed new "Consolidated Plan"
- Formal approval by elected officials of a final "Annual Action Plan" or "Consolidated Plan"
- On occasion during the year, it might be essential to change the use of the money already budgeted in an "Annual Action Plan", or to change the priorities established in the "Consolidated Plan". In that case, a formal "Substantial Amendment" will be proposed, considered and acted upon.
- After a program year is complete, the "Consolidated Annual Performance and Evaluation Report (CAPEE)" must be drafted for public review, commented and then sent to HUD

### The Programmed Year

The Program year selected by the City of Mansfield is July 1<sup>st</sup> through June 30<sup>th</sup>.

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## 2019-2023 MANSFIELD CITIZEN PARTICIPATION PLAN

**Substantial Amendments**

Prior to the submission of any substantial change in the use of funds, citizens will have thirty (30) days to comment on the proposed amendment using the citizen participation methods outlined in this plan and/or other methods that result in effective notice and commenting. All changes in use of funds will be subject to Mansfield City Council approval.

A substantial amendment to the *Consolidated Plan* is when one of the following decisions is to be made:

- A change in the use of CDBG and HOME money from one project\* to another, and a change to increase or decrease funding or cost of a project by more than \$50,000. (This does not include projects that are completed under budget by more than \$50,000, but the use of the unspent funds will require City Council Approval, with comment opportunity given to the public)
- The addition of a project not originally described in the *Consolidated or Annual Action Plan*.
- A change in the purpose of a project, such as a change in the type of activity or its ultimate objective. For example, a change in a construction project from housing to commercial.

(\*The term "project" refers to a budget line item—often called a "program"—as delineated in the yearly action plan.)

For more information regarding the 2024-2029 *Consolidated Plan* or to submit your comments, please contact Adrian Ackerman at [ackerman@ci.mansfield.oh.us](mailto:ackerman@ci.mansfield.oh.us) or call 419-755-9793, or write to City of Mansfield, Department of Community Development, 30 North Diamond St. Mansfield, Ohio 44902 or visit the City's website at: <https://ci.mansfield.oh.us/community-development/>.

Amended-7/19/22

Mansfield City Council Approval—8/16/22

Public Comment Period- 8/22/22- 9/26/22

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## 2019-2023 MANSFIELD CITIZEN PARTICIPATION PLAN

are able to comment during City Council, and to Community Development staff during the planning process.

**Access to Information**

Citizens, public agencies and other interested parties, including those most affected will have the opportunity to receive information, review and submit comments on any proposed submission concerning any of the following documents:

- The proposed and final "Annual Action Plans"
- The proposed and final "Consolidated Plan"
- Proposed and final Substantial Amendments to either an "Annual Action Plan" or the "Consolidated Plan"
- Annual Performance Reports
- The Citizen Participation Plan
- Analysis of Impediments / Affirmatively Furthering Fair Housing

Interested parties may access these documents at no cost through the internet, at the

Community Development section of the City of Mansfield's website:

<https://ci.mansfield.oh.us/community-development/>, or by contacting staff. The city will make every attempt to provide these materials in a form that is accessible to persons with disabilities and individuals that are Non-English speaking, when requested.

Involved citizens will be provided a 15 day period to comment on the City's CAPEX, prior to HUD submittal around September 15th of each year depending on HUD's requirements, and CAPER completion date.

**Technical Assistance**

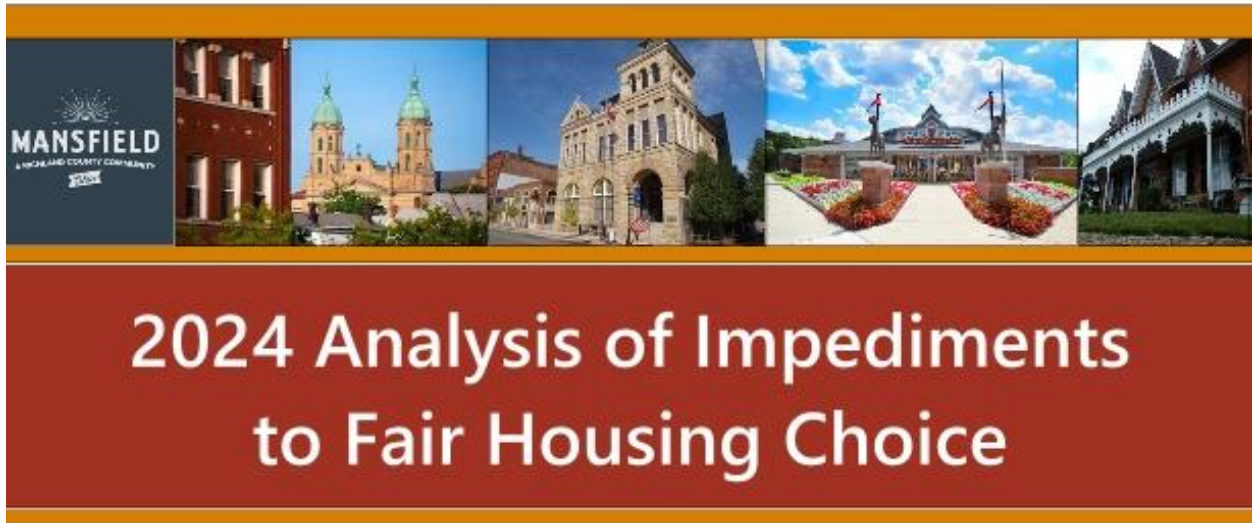
City staff will work with organizations and individual representatives of low to moderate-income people who are interested in submitting a proposal to obtain funding for an activity. All potential applicants for funding are encouraged to contact city staff for technical assistance. Additionally, city staff will work with individuals and organizations receiving "Consolidated Plan" monies to ensure that funds are being spent for their intended purpose and within the rules and regulations of the federal government.

**Timely Response to Complaints and Grievance**

City staff will provide timely, written response to written complaints and grievances within the fifteen (15) day period of receipt, where practical.

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## 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 identified 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 certify 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-manicured, 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 opportunities, 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*

regulations for their specific certification requirements at 24 CFR part 91 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 their 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://egis.hud.gov/affht/>). 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://egis.hud.gov/cpdmaps/>. 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.dol.gov/general/topic/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

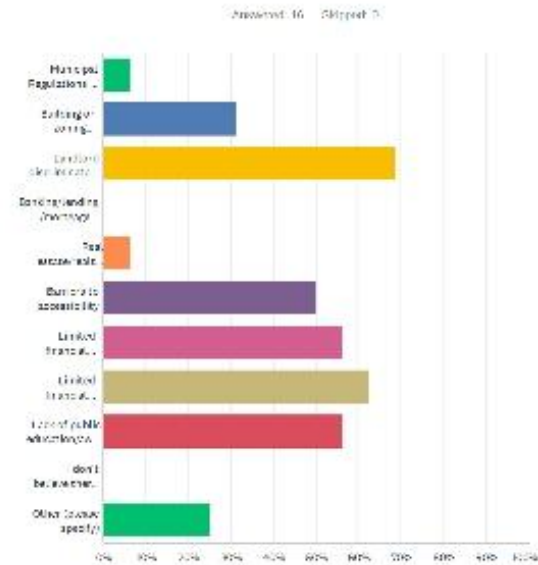
Additional barriers identified by stakeholder survey respondents included building or zoning regulations, municipal regulations and ordinances, real estate/realtor discriminatory or unethical practices, eviction expungement opportunities, the common opinion that there is no problem, housing costs, and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

Also, 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:

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.*

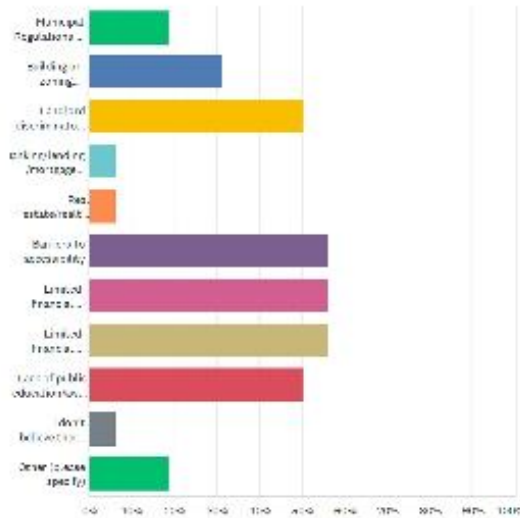
## Stakeholder Survey - Fair Housing Questions

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)



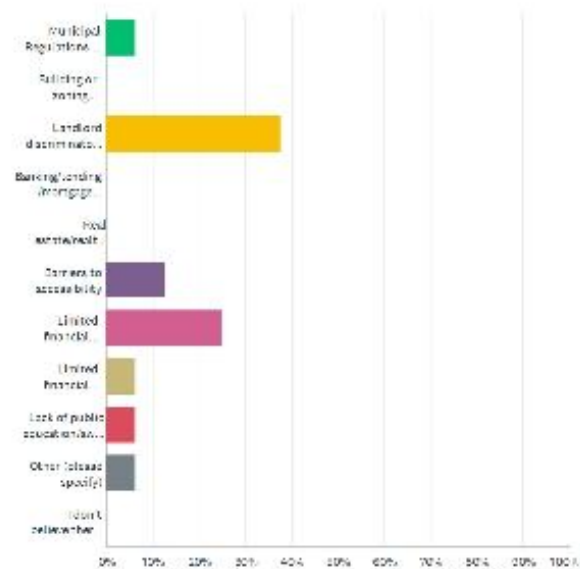
ANSWER CHOICES		RESPONSES	
Municipal Regulations and Ordinances		6.25%	1
Building or zoning regulations		31.25%	5
Landlord discriminatory or unethical practices		68.75%	11
Banker/government/mortgage discriminatory or unethical practices		0.00%	0
Real estate/agent discriminatory or unethical practices		6.25%	1
Barriers to accessibility		50.00%	8
Limited financial assistance for home ownership of elderly, minorities, and/or low-income households		56.25%	9
Limited financial assistance for renters		62.50%	10
Lack of public education/awareness regarding rights and responsibilities		56.25%	9
I don't believe there are barriers to fair housing choice		0.00%	0
Other (please specify)		25.00%	4
Total Respondents: 16			
#	OTHER (PLEASE SPECIFY)	DATE	
1	Eviction exchange/emergency opportunities	12/29/2024 3:19 PM	
2	The biggest barrier in my opinion is the common opinion that there is no problem	1/27/2024 5:56 PM	
3	Cost is a major factor overall	1/29/2024 11:10 AM	
4	Lack of housing supply	1/29/2024 5:27 PM	

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)



ANSWER CHOICES		RESPONSES	
Municipal Regulations and Ordinances		18.75%	3
Building or zoning regulations		31.25%	5
Random discriminatory or unethical practices		50.00%	8
Bank/credit/mortgage discriminatory or unethical practices		6.25%	1
Real estate/realtor discriminatory or unethical practices		6.25%	1
Barriers to accessibility		56.25%	9
Limited financial assistance for home ownership of elderly, minorities, and/or low-income households		56.25%	9
Limited financial assistance for renters		56.25%	9
Lack of public education/awareness regarding rights and responsibilities		50.00%	8
I don't believe there are barriers to fair housing choice		6.25%	1
Other (please specify)		18.75%	3
Total Respondents: 16			
1	OTHER (PLEASE SPECIFY)	DATE	
1	Funding for legal representation in housing litigation	1/28/2024 8:10 PM	
2	Cost of transportation could also be a factor outside the city limits	1/25/2024 11:10 AM	
3	Lack of housing supply	1/22/2024 3:27 PM	

Which one in the following 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)



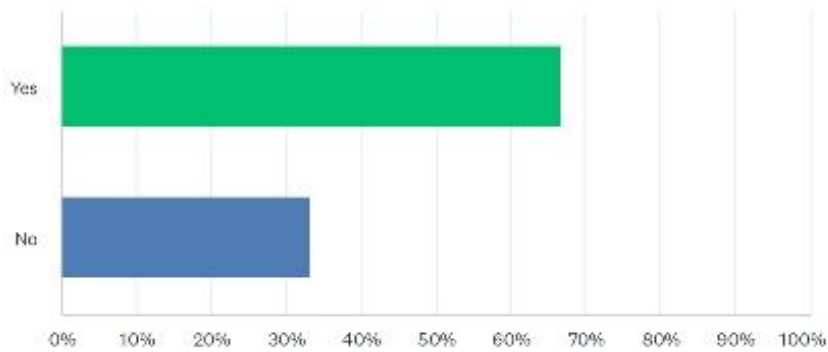
ANSWER CHOICES	RESPONSES	
Municipal Regulations and Ordinances	6.25%	1
Building or zoning regulations	0.00%	0
Landlord discriminatory or unethical practices	37.50%	5
Banking/lending/mortgage discrimination or unethical practices	0.00%	0
Real estate/realtor discriminatory or unethical practices	0.00%	0
Barriers to accessibility	12.50%	2
Limited financial assistance for home ownership of elderly, minorities, and/or low-income households	25.00%	4
Limited financial assistance for renters	6.25%	1
Lack of public education/awareness regarding rights and responsibilities	6.25%	1
Other (please specify)	6.25%	1
I don't believe there are barriers to fair housing choice	0.00%	0
<b>TOTAL</b>		<b>16</b>

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

#	RESPONSES	DATE
1	Home buyer assistance, another fee legal aid.	1/22/2024 8:27 AM
2	Enforcement of Landlord unethical practices.	1/23/2024 7:21 AM
3	Property owners registry. Incentives should be offered to attorneys who assist in eviction expungement and fair practice assistance.	1/23/2024 9:19 PM
4	City and County collaborations with financial institutions and education on how to access those funds.	1/27/2024 9:15 PM
5	Work with people who are willing to build new homes and rentals.	1/27/2024 8:58 PM
6	Training for landlords. Penalties for evictions.	1/27/2024 5:35 PM
7	Preventing income source as criteria for rental discrimination.	1/28/2024 7:57 PM
8	rental housing registry.	1/29/2024 4:02 PM
9	Receiving more LMA for the county is a possibility. Government grants if available.	1/29/2024 11:10 AM
10	Rental registry - accountability and oversight for rental properties and landlords will help ensure properties are up to code and increase the number of safe and affordable housing options for residents.	1/29/2024 1:46 PM
11	Guarantee fund? it's difficult if the available properties are too expensive for the applicant's income.	1/29/2024 1:40 PM
12	Revisiting and modernizing Codes.	1/29/2024 12:14 AM
13	It would be great to have funds set aside to allow for building rental units. Cost of building is high and when trying to ensure the rents are affordable, it causes issues. You can't build without support and keep the rents affordable.	1/29/2024 4:58 PM
14	Not only are the tenants unaware of local rights and responsibilities, many of the landlords are unaware and don't care to learn the legal stuff. They just see a way to make money without understanding their responsibilities.	1/29/2024 3:33 PM
15	Loans at lower interest rates for developers who want to build affordable/sustainable housing.	1/22/2024 3:27 PM

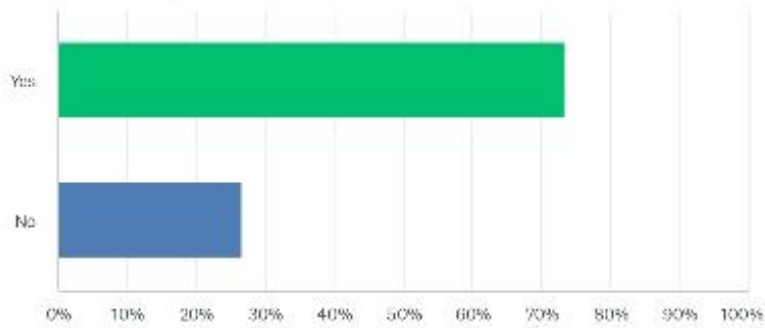
**Public Survey – Fair Housing Questions**

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?



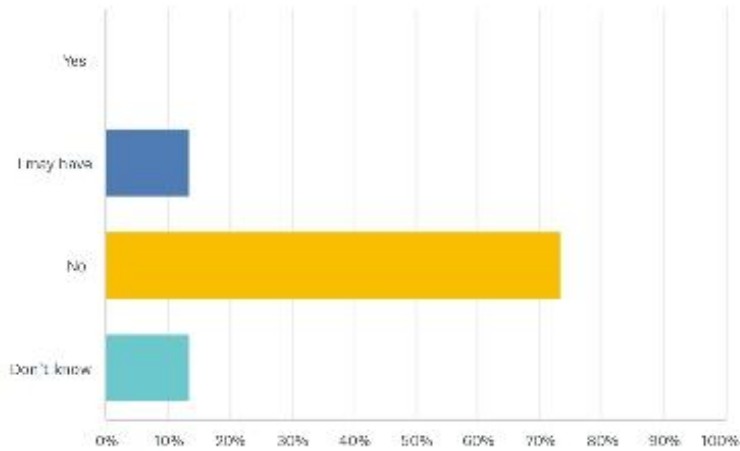
ANSWER CHOICES	RESPONSES
Yes	66.67% 10
No	33.33% 5
TOTAL	15

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



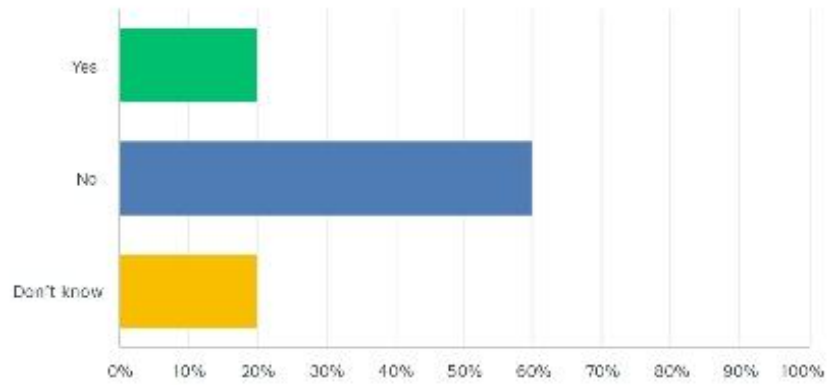
ANSWER CHOICES	RESPONSES	
Yes	73.33%	11
No	26.67%	4
TOTAL		15

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



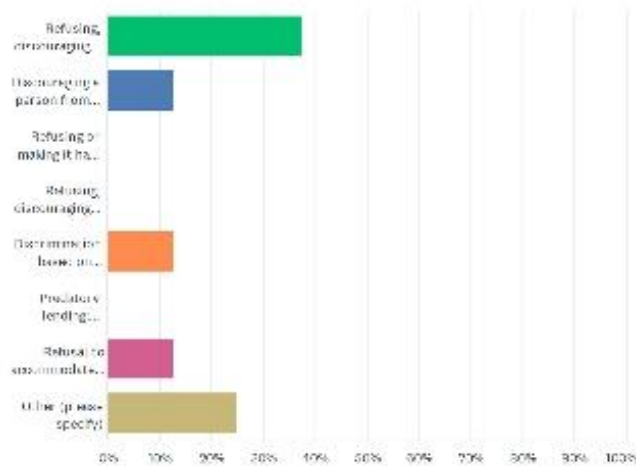
ANSWER CHOICES	RESPONSES	
Yes	0.00%	0
I may have	13.33%	2
No	73.33%	11
Don't know	13.33%	2
TOTAL		15

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



ANSWER CHOICES	PERCENTAGE	COUNT
Yes	20.00%	3
No	60.00%	9
Don't know	20.00%	3
TOTAL		15

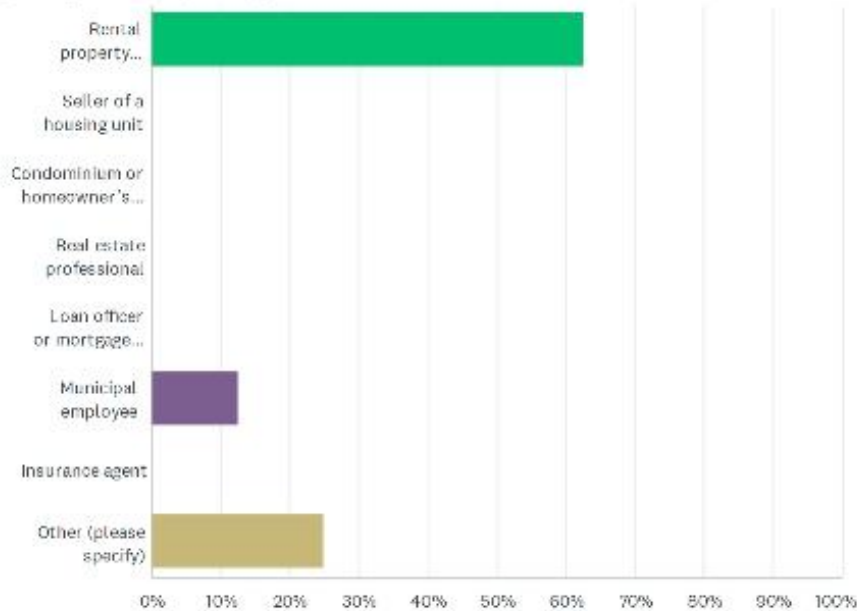
If you believe that you or someone you know encountered housing discrimination in your local area, which of the following best describes the type of discrimination?



ANSWER CHOICES	RESPONSES
Refusing, discouraging, or charging more to rent an apartment or buy a home.	37.50% 3
Discouraging a person from living where he or she wants to live, often by steering him or her to another house, apartment, complex or neighborhood.	12.50% 1
Refusing or making it hard to get a loan to buy or refinance a house or take out home equity by doing things like charging more money or offering a worse 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 an apartment more accessible for a person with a disability or lack of accessible units.	12.50% 1
Predatory lending: 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)	25.00% 2
<b>TOTAL</b>	<b>6</b>

#	OTHER (PLEASE SPECIFY)	DATE
1	I think poor behavior within the household is our biggest issue. If a large and growing percentage of parents in this school district (compared to others) can't show up for and build up our own kids at home, what are we doing with our lives? And worse, it is an issue that gets dismissed but still spans all neighborhoods.	1/25/2024 10:03 AM
2	NA	1/24/2024 3:11 PM

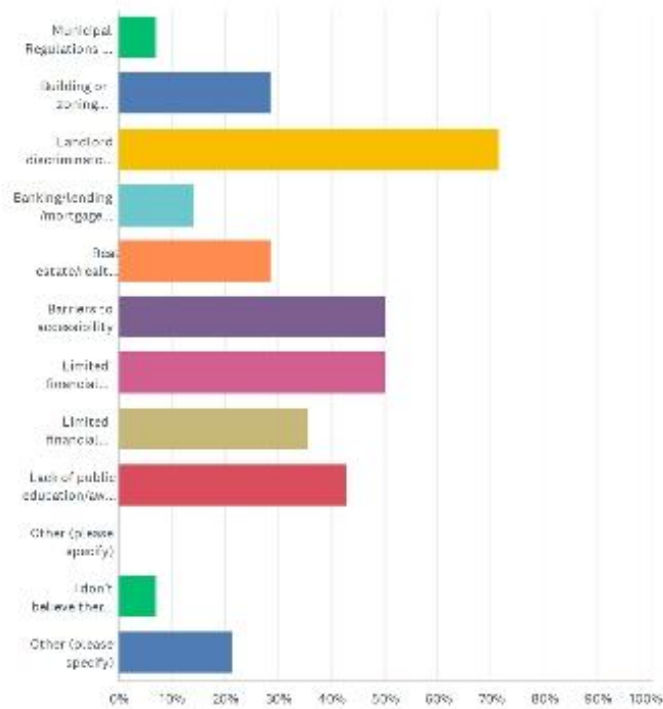
If yes, which of the following best describes the person or organization that discriminated against you or the person you know?



ANSWER CHOICES		RESPONSES	
Rental property manager/owner		62.50%	5
Seller of a housing unit		0.00%	0
Condominium or homeowner's association		0.00%	0
Real estate professional		0.00%	0
Loan officer or mortgage broker		0.00%	0
Municipal employee		12.50%	1
Insurance agent		0.00%	0
Other (please specify)		25.00%	2
TOTAL			8

#	OTHER (PLEASE SPECIFY)	DATE
1	Not applicable.	1/25/2024 10:00 AM
2	NA	1/24/2024 5:11 PM

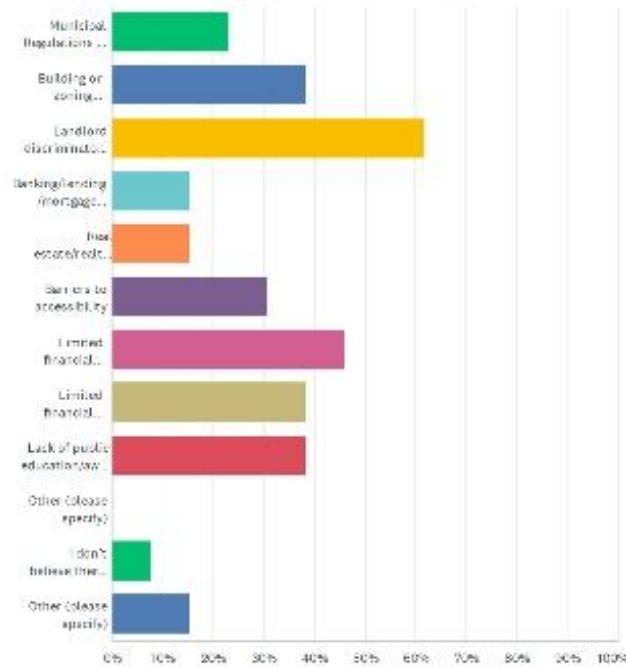
Which of the following do you believe to be barriers to fair housing choice in the City of Mansfield, if any? (mark all that apply)



ANSWER CHOICES	RESPONSES	
Municipal Regulations and Ordinances	7.14%	1
Building or zoning regulations	28.57%	4
Landlord discriminatory or unethical practices	71.43%	10
Banking/lending/mortgage discriminatory or unethical practices	14.29%	2
Real estate/realtor discriminatory or unethical practices	28.57%	4
Barriers to accessibility	50.00%	7
Limited financial assistance for home ownership of elderly, minorities, and/or low-income households	50.00%	7
Limited financial assistance for renters	35.71%	5
Lack of public education/awareness regarding rights and responsibilities	42.86%	6
Other (please specify)	0.00%	0
I don't believe there are any barriers to fair housing choice	7.14%	1
Other (please specify)	21.43%	3
Total Responses: 14		

#	OTHER (PLEASE SPECIFY)	DATE
1	When I was searching for a house, I had pre-approved by one financial institution, but when we wanted to make an offer on a house, the listing realtor said she didn't like working with my lender so I needed to get pre-approved elsewhere. I did try, and basically was told I would not have enough money saved in my bank account and to try again next year. I don't think this was discrimination, but I do think there are definitely barriers, and I think it would help younger people to have more resources and education on home buying. I also think landlords should have caps on the rent that they can charge. There are a lot of "investors" flipping houses that buy them all up and sell them for more money, or rent them out for crazy amounts. My husband and I have a joint income of around \$0,000 a year, we are tight on money due to issues like our car needing a new transmission, the cost of food, etc. I can't imagine what those who have a lower income are experiencing. It is EXTREMELY difficult to find clean, safe, affordable housing.	1/25/2024 12:34 PM
2	The city's reliance on income tax to finance essential projects that should ideally be accommodated within the budget is a challenge that affects all residents. It seems to have evolved into a preferred quick fix rather than a sustainable strategy. A household earning \$100,000, representing two median incomes, is now burdened with a \$225 per month income tax, surpassing a more ideal 1% tax (see successful nearby cities) by \$125. The proposal to further increase this tax for ongoing basic city infrastructure adds another layer to the concern. The fact that this quiz caps household income at \$100,000 is disheartening. As we envision progress for Mansfield, it's crucial to expect and strive for more. Ironically, the argument may be made that \$125 per month is a negligible amount by certain elected (and unelected) city officials. However, I wonder if they realize a city asking a \$100,000 household for 1.25% more reduces their buying power by \$45,000 over a 30-year mortgage, is the depressed 'cost of living' higher than the cost of staying? Often so. This situation is particularly challenging for households earning between \$60,000 and \$90,000, as it significantly impacts take-home income amid historically high inflation. The absence of any inclination to reduce income tax exacerbates the issue. To enhance the city's vibrancy, we need to attract more talent. It's essential for public employees and elected officials to align their actions with the aspirations of existing and potential successful citizens and businesses vital for the city's prosperity. Until such changes occur, there's a risk that the city and its departments might not fully embody the mindset necessary to attract and retain the talent Mansfield needs. Let's aspire for a future where the city's financial strategies align with the aspirations of its citizens and businesses, fostering a symbiotic relationship for collective well-being.	1/25/2024 10:03 AM
3	Lack of housing supply. This means that landlords have more power over renters and can (and often will) abuse this power as a result.	1/22/2024 10:38 AM

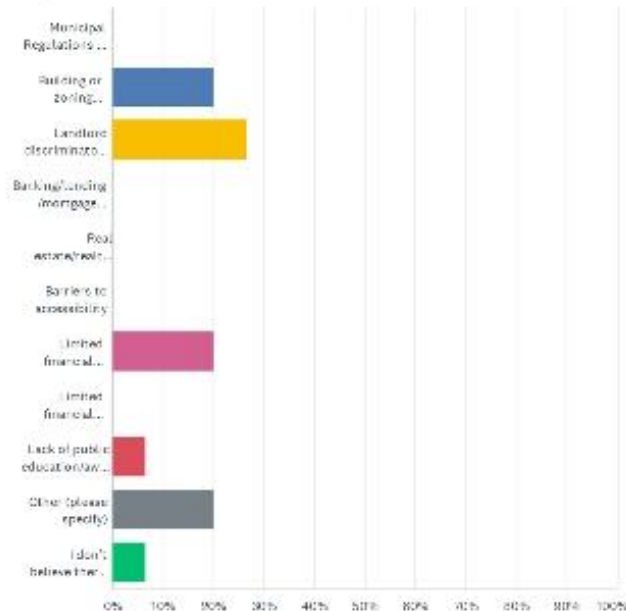
Which of the following do you believe to be barriers to fair housing choice in Richland County (outside the City of Mansfield), if any? (mark all that apply)



ANSWER CHOICES	RESPONSES
Municipal Regulations and Ordinances	23.08% 3
Building or zoning regulations	38.46% 5
Landlord discriminatory or unethical practices	61.54% 8
Banking/lending/mortgage discriminatory or unethical practices	15.38% 2
Real estate/real estate discriminatory or unethical practices	15.38% 2
Barriers to accessibility	30.77% 4
Limited financial assistance for home ownership of elderly, minorities, and/or low-income households	46.15% 6
Limited financial assistance for renters	38.46% 5
Lack of public education/awareness regarding rights and responsibilities	38.46% 5
Other (please specify)	0.00% 0
I don't believe there are any barriers to fair housing choice	7.69% 1
Other (please specify)	15.38% 2
Total Respondents: 13	

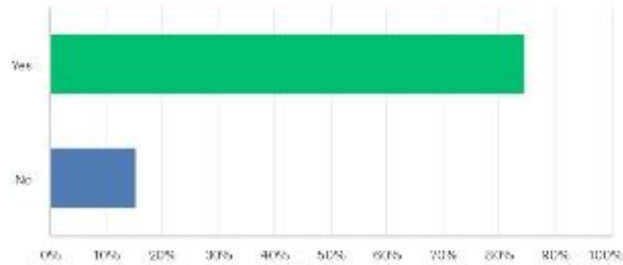
#	OTHER (PLEASE SPECIFY)	DATE
1	The pivotal question lies in whether individuals with the means to invest find joy in collaborating with Mansfield's public employees and elected officials, especially in comparison to other locales. The exodus of individuals making this choice is undeniable. By observance, I suspect someone like Ashland mayor Matt Miller might face jests within Mansfield's city hall because he dares to be different. The joke is on Mansfield. Observing city hall, there seems to be a tendency for deflection and blame-shifting. A quick Google search reveals the implications of such symptoms. The emergence of Ontario and Lexington-Springmill is a testament to economic and residential sectors, including new home builders and business investors, voting with their feet. Mansfield tends to attract bargain buyers rather than investors. They use us. They do not join us. A critical inquiry arises: How many individuals from past mismanagement acts now draw both pensions and salaries? How many of them and others working with or even for them are open to challenging the status quo? Have they actively embraced new ideas or resisted change? The culture in city hall, seemingly stagnant since the 1950s and potentially repelling talent, deserves attention. Addressing this challenge head-on, embracing the inevitable resistance, is the noise of community recovery. Let's instigate positive change that mirrors communities we want to be more like.	1/25/2024 10:03 AM
2	Don't know	1/25/2024 8:08 AM

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)



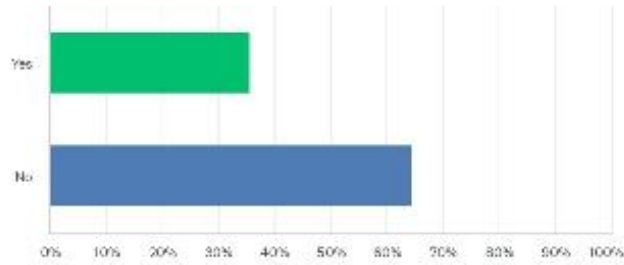
ANSWER CHOICES	RESPONSES	
Municipal Regulations and Ordinances	0.00%	0
Building or zoning regulations	20.00%	3
Landlord discriminatory or unethical practices	26.67%	4
Banking/lending/mortgage discriminatory or unethical practices	0.00%	0
Real estate/creator discriminatory or unethical practices	0.00%	0
Barriers to accessibility	0.00%	0
Limited financial assistance for home ownership of elderly, minorities, and/or low-income households	20.00%	3
Limited financial assistance for renters	0.00%	0
Lack of public education/awareness regarding rights and responsibilities	6.67%	1
Other (please specify)	20.00%	3
I don't believe there are any barriers to fair housing choice	6.67%	1
<b>TOTAL</b>		<b>15</b>

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



ANSWER CHOICES	RESPONSES	
Yes	84.62%	11
No	15.38%	2
TOTAL		13

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



ANSWER CHOICES	RESPONSES	
Yes	35.71%	5
No	64.29%	9
TOTAL		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 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. Inadequate jobs, blight, and an aging housing stock are ongoing challenges.

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

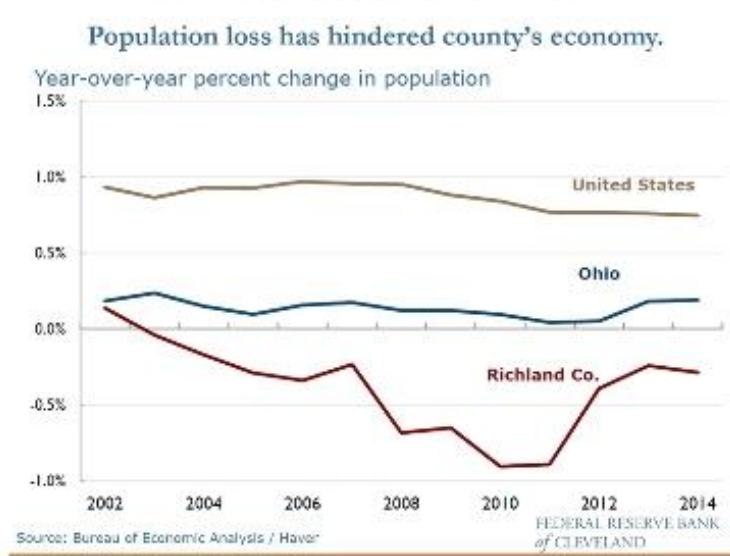


Photo 3B: Sample of Housing in Mansfield, Ohio (Google Maps)



**Population and population Growth:** The population of the City of Mansfield, according to the 2022 ACS was 47,865, 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

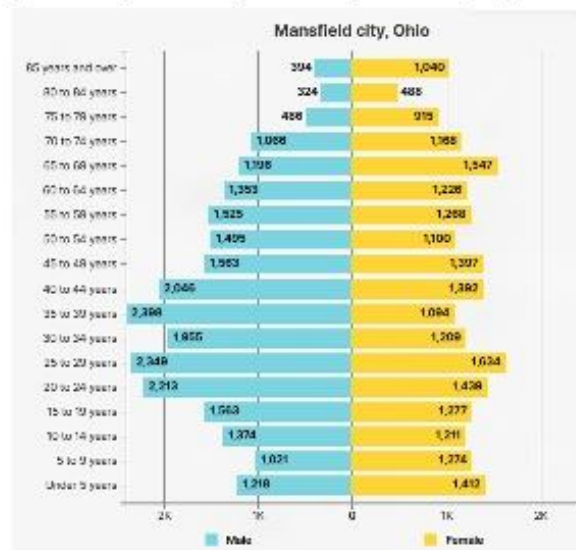


**Sex:** There are some other differences based upon sex that are worth noting, and that may have potential ramifications for fair housing issues. According to the 2022 ACS, 46.4% of the population in the City of Mansfield was female and 53.6% was male. This is a somewhat higher than usual male population percentage. Also note that there is a larger than average number of people living alone in the City, 40.1% of households are a single person living alone. This compares to 36.2% for the State of Ohio overall. There appears to be a

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 1,024 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 3B: 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 households in this situation. 0.6% 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 rearing 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

*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)	\$33,109
Some college or Associates degree	\$34,960
Bachelor's degree	\$42,371
Graduate or Professional degree	\$102,656
Female	\$28,717
Less than high school graduate	\$19,495
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 impacts their access to appropriate housing.

**Veterans:** 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.

**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 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 shrunk. Finally, in 2010, Mansfield was declared to be in fiscal emergency with a deficit of \$3.8 million. The city's financial crisis lasted nearly four years before being lifted out of fiscal emergency on July 9, 2014.

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

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, Dofasco), and Food (Isaly Dairy, Stewart's Restaurants, Jones Potato Chip Company).

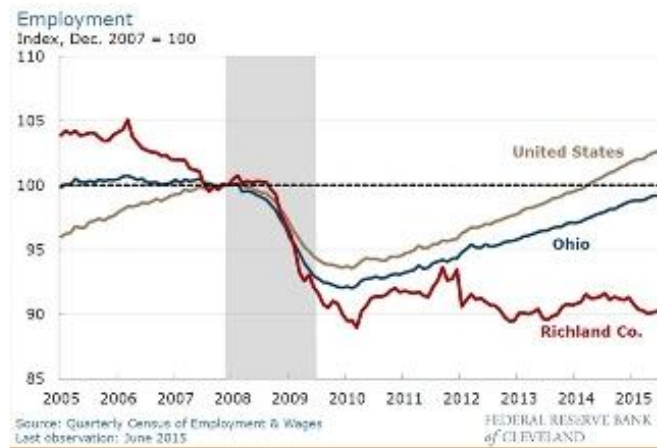
As shown in Table 3C, the percentage employed (45.4%), unemployment rate (7.8%), and the median household income (\$40,996) are all poor compared to the State averages. As of February 2024, Richland County, which includes the City of Mansfield ranked 27<sup>th</sup> out of 88 Ohio Counties for Unemployment 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

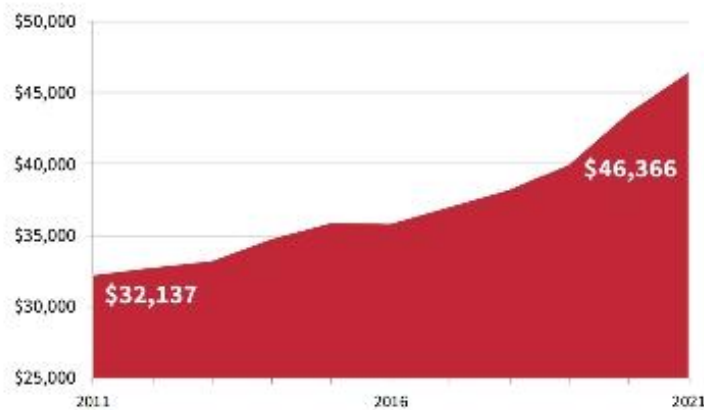
Data source: 2022 ACS

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

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	0.2%
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% ami

categories, and the Black/African American population more impacted in the 50-80% and 80-100% ami 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 (\$66,990) 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, 280 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

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 1.3% 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				

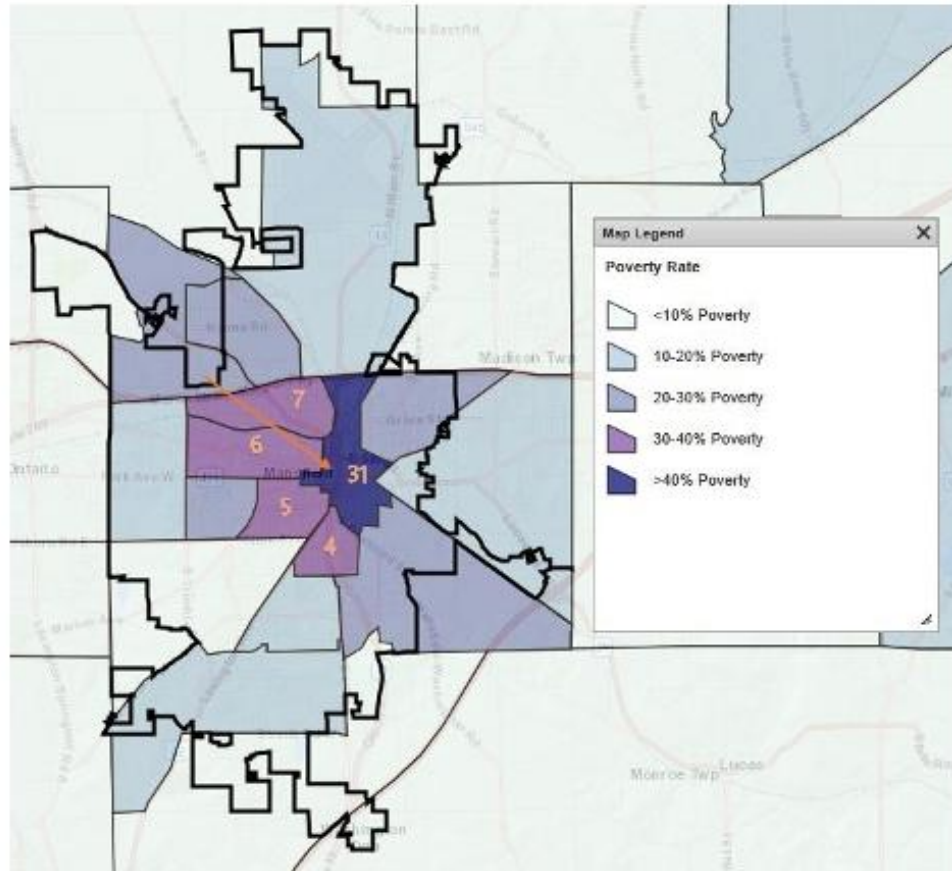
Data Source: 2013-2017 CHAS, as used in the 2024-2029 City of Mansfield Consolidated Plan.

\*No, or 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



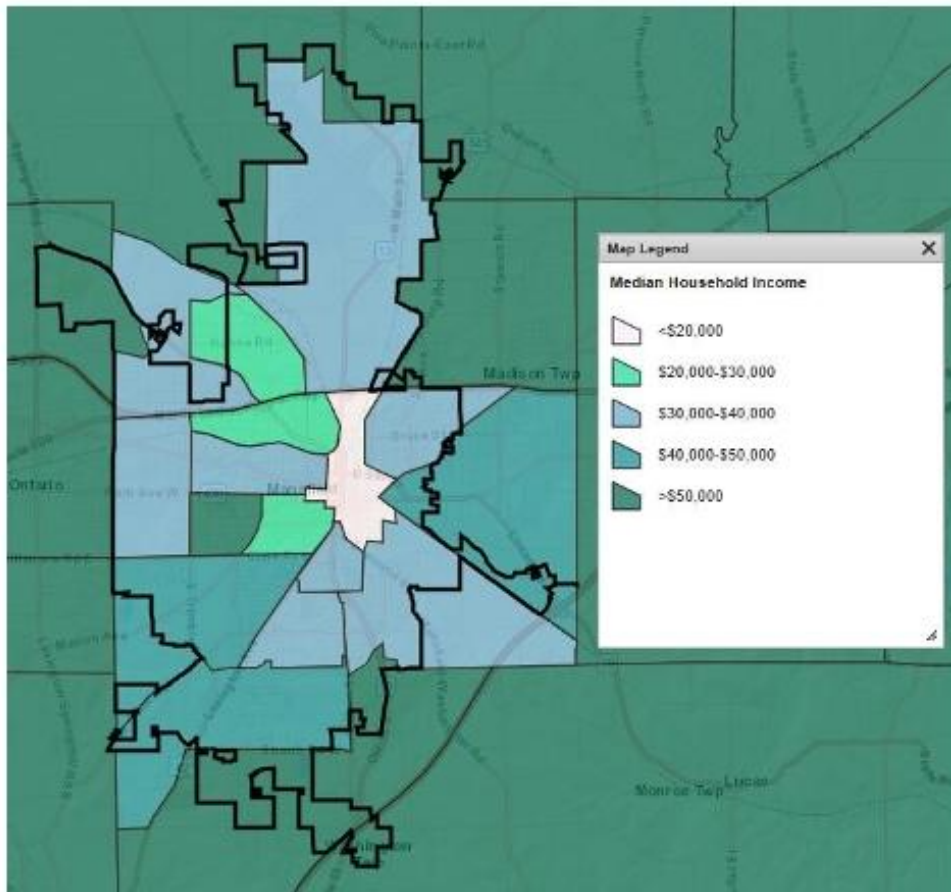
Data source: CPD Maps

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

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 (\$40,996) remain well below those for Richland county (\$56,557) and the State of Ohio (\$66,990).

**Map 3C: Median Household Income, by Census Tract**



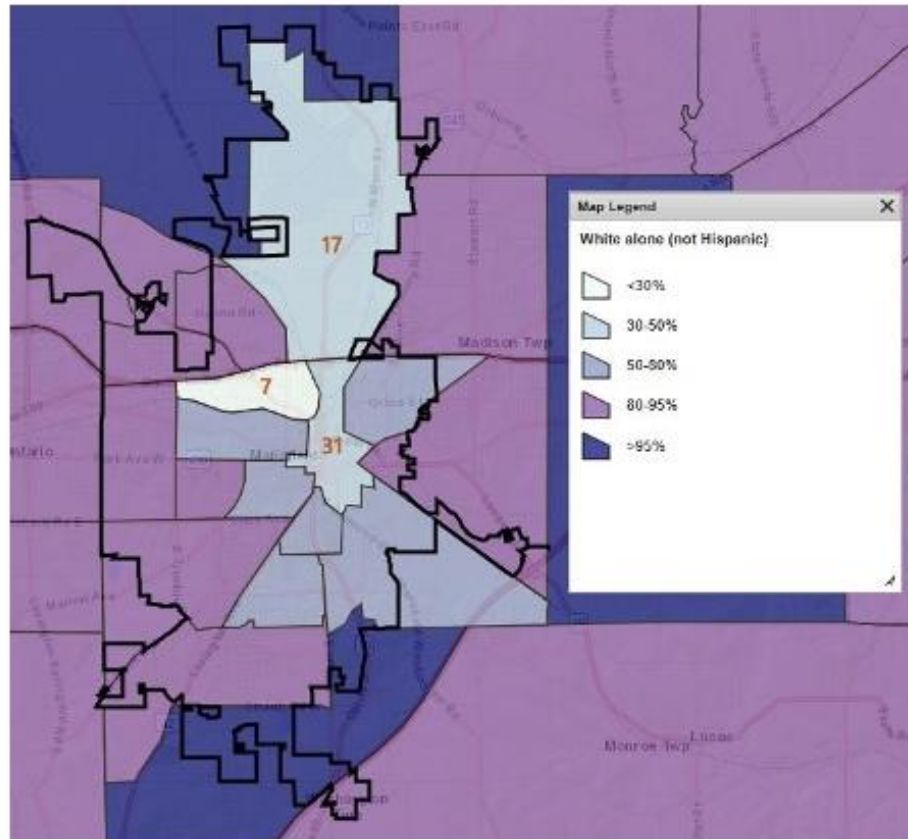
Data source: CPD Maps

### 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

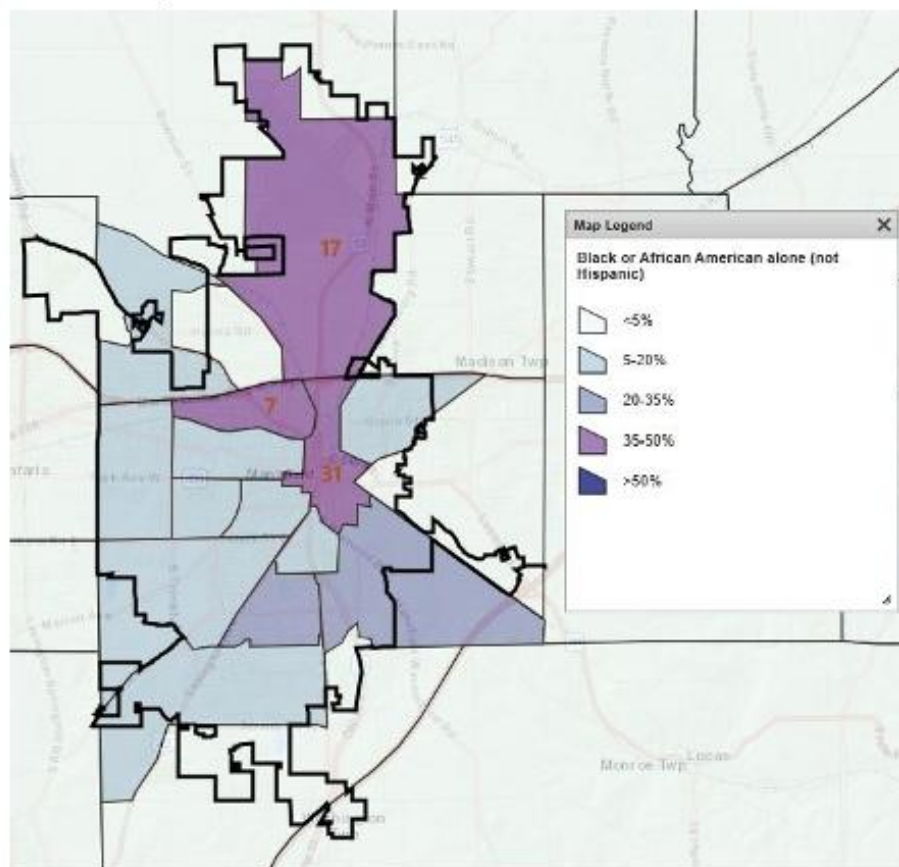
Map 3E shows that the highest percentages of Black/African American alone population are found in the areas with the lowest White population (census tracts 7 and 31). From Table 3D, we can see that there is a very small (.2%) percentage of the population that is American Indian and Alaska Native alone,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

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.*

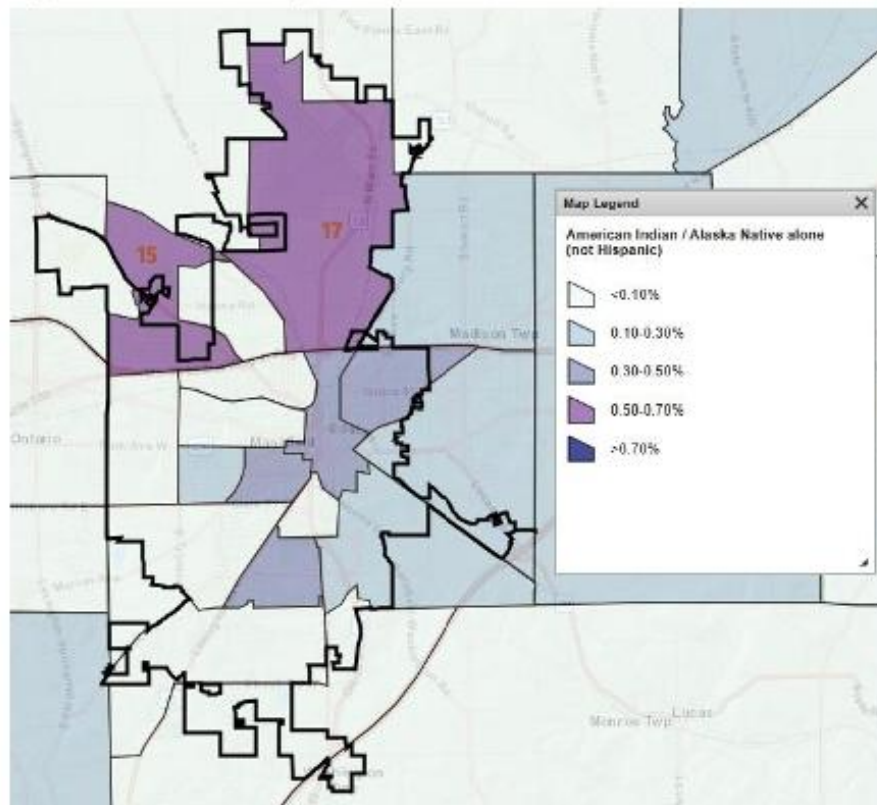
The greatest concentration of the small Population Identifying as Some Other Race (1.2%) are found in census tract 9 (Map 3I), and on Map 3J, we find that the greatest concentration of the Population identifying as Two or More Races (non-hispanic) (7.9%) is in census tracts 7, 14, and 5.

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



Data Source: HUD CPD Maps

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

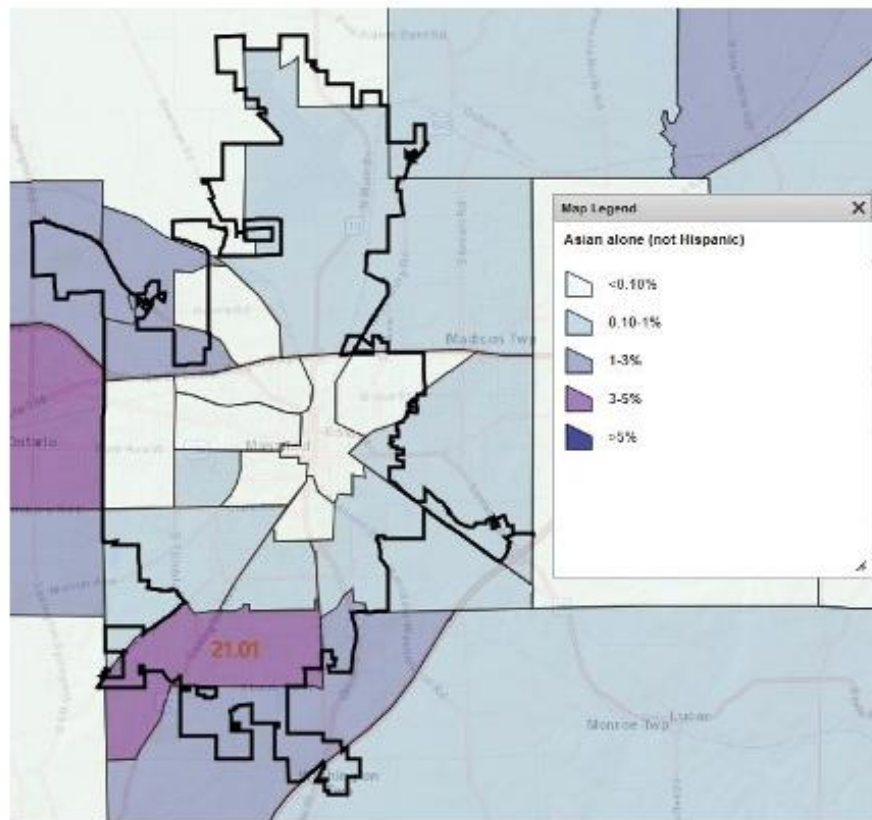


Data Source: HUD CPD Maps

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 8, 9, 13, 14, 15, 16, and 21.01). 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.

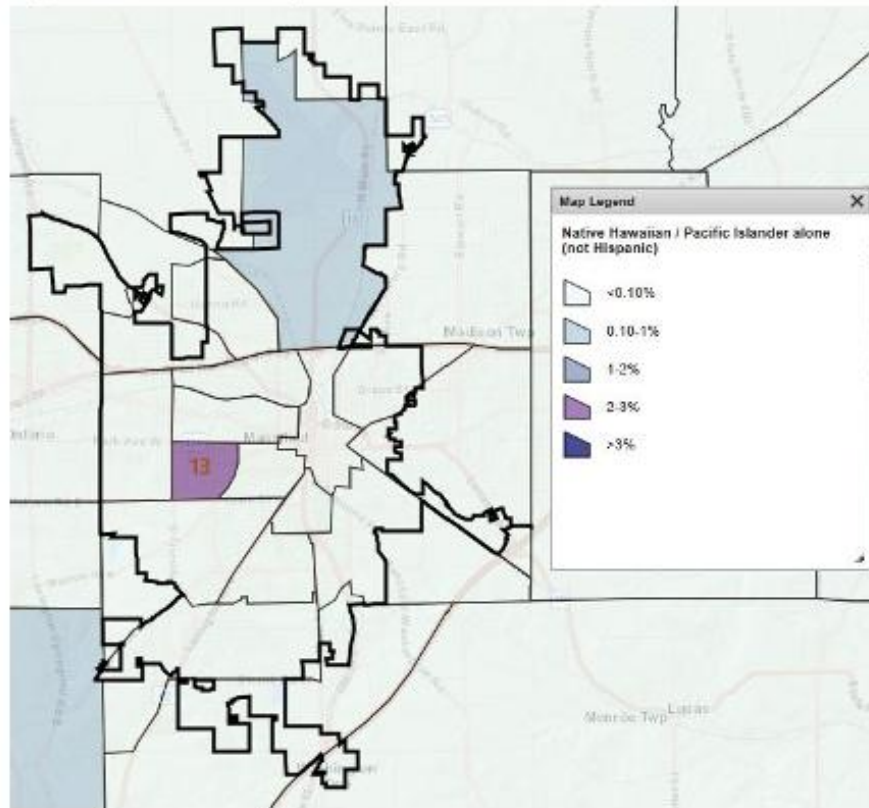
**Map 3G: Dispersion of the Asian (Alone, Non-Hispanic) Population Across the City of Mansfield**



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.

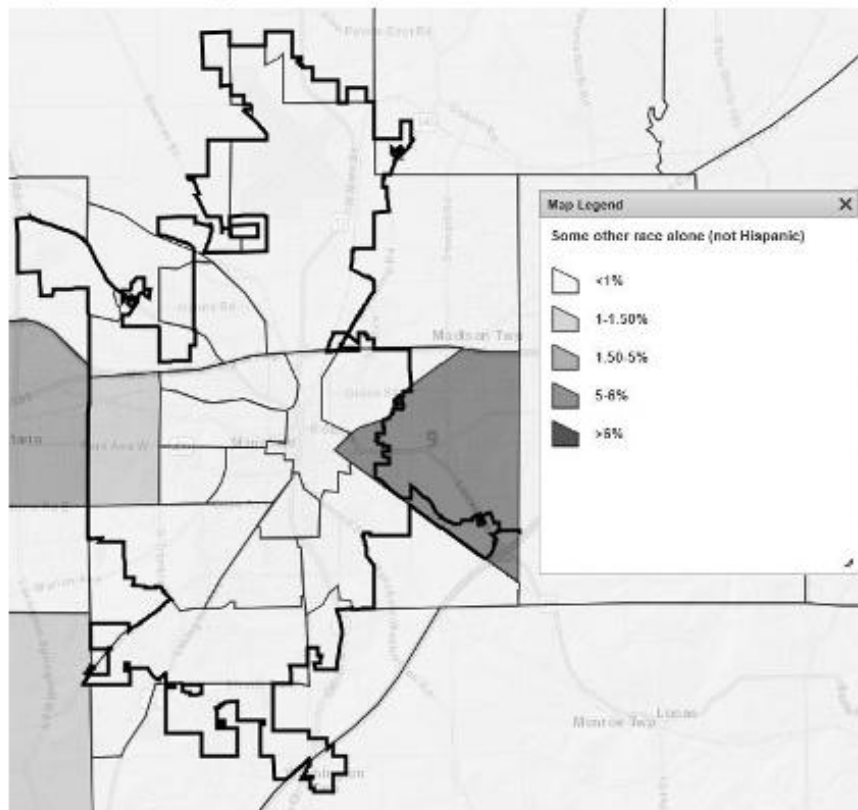
**Map 3H: Dispersion of the Native Hawaiian/Pacific Islander (Alone, Non-Hispanic) Population Across the City of Mansfield**



Data Source: HUD CPD Maps

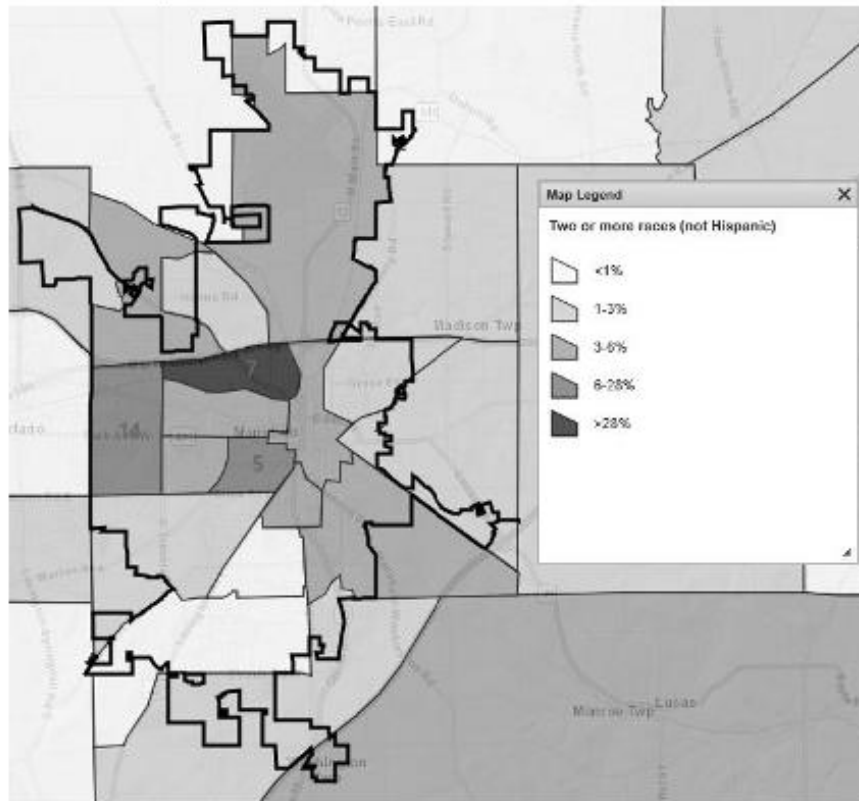
Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold 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 3I: Dispersion of The Population Identifying as Some Other Race (alone, Non-Hispanic) in the City of Mansfield**

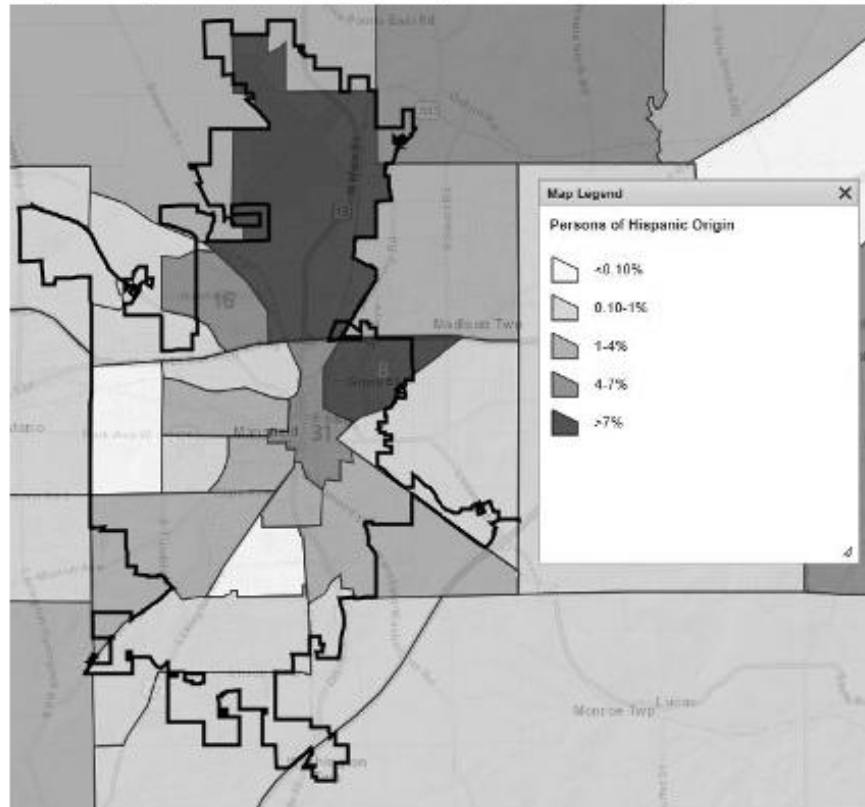


*Data Source: HUD CPD Maps*

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



Data Source: HUD CPD 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, 43,106 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

*Of the 45,000 total persons five and above in the City of Mansfield, there are 1,894 people (4.2%) that speak a language other than English as their primary language at home. Of those, 689, or 1.53% of the total persons five and above have limited English-speaking 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
<b>Spanish</b>	870	1.9%	365	.8%
<b>Other Indo-European languages</b>	636	1.4%	198	.4%
<b>Asian and Pacific Island languages</b>	215	.5%	92	.2%
<b>Other languages</b>	173	.4%	34	.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 12.9% for the US over all. 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

*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.*

Black/African American population have the highest percentage of disability (25%), 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%
<b>Sex</b>			
Male	20,388	4,169	20.4%
Female	21,741	4,591	21.1%
<b>Race and Hispanic or Latino origin</b>			
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 P. Islander alone	141	13	9.2%
Some other race alone	394	60	15.2%
Two or more races	3,341	387	11.6%
Hispanic or Latino (of any race)	937	190	20.3%
<b>Age</b>			
Under 5 years	2,630	0	0%
5 to 17 years	6,487	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	4,797	1,767	36.8%
75 years and over	3,341	1,583	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		
hearing	1,806	4.3%
Vision	1,907	4.5%
Cognitive	3,815	9.7%
Ambulatory	4,320	10.9%
Self-care	1,878	4.8%
Independent living	3,191	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.

*We want to understand more fully where concentrations of these groups exist, and what some of the limitations are to opportunity for these groups.*

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%.

*Next, we want to look at each of the opportunity factors, and their associated indices, as we seek to understand where opportunity is lacking for population groups residing in each census tract.*

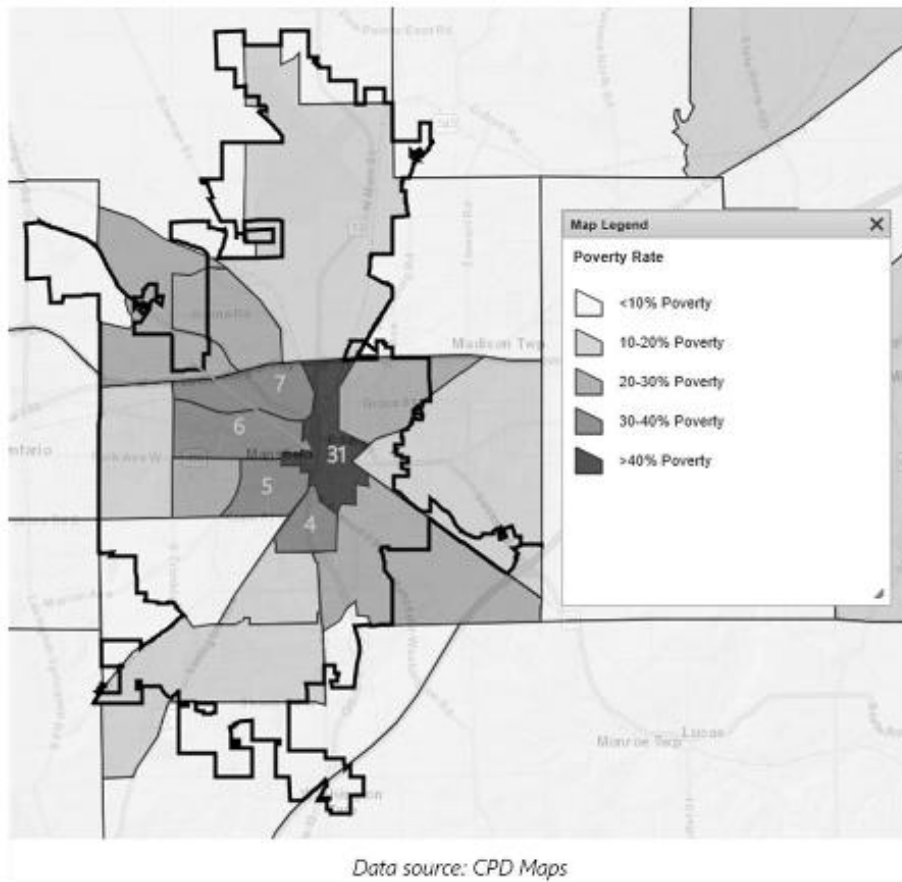
Where the percentage of a racial minority in any of the selected census tracts did not exceed 2%, we did not include that racial minority on the chart. We included the percentage of households who speak a language other than English in the home. Surprisingly there was no correlation between limited English proficiency and the percentages of persons with national origins outside the United States.

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 their 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**



**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 21.01	Census Tract 21.02 <sup>1</sup>	Census Tract 11	Census Tract 13	Census Tract 10 <sup>1</sup>	Census Tract 14	Census Tract 16	Census Tract 9 <sup>1</sup>	Census Tract 15 <sup>1</sup>	Census Tract 8	Census Tract 4	Census Tract 7	Census Tract 17 <sup>2</sup>	Census Tract 5	Census Tract 31	Census Tract 6
White	89%	90%	92%	89%	84%	82%	79%	90%	93%	94%	82%	76%	38%	41%	68%	60%	54%
Black/African American	7%	5%	4%	8%	11%	13%	15%	6%	3%	2%	12%	19%	56%	24%	33%	37%	
Hispanic*	1%	2%	1%	1%	2%	2%	3%	2%	0%	2%	2%	2%	2%	3%	3%	2%	3%
Two or more races	2%	2%	2%	3%	3%	3%	2%	2%	2%	2%	3%	5%	4%	0%	5%	5%	5%
National Origin*	1%	3%	1%	1%	0%	1%	1%	1%	0%	2%	1%	0%	0%	0%	1%	0%	0%
Limited English Proficiency**	.5%	0%	0%	.3%	.4%	.4%	1.6%	1.8%	0%	0%	.4%	.3%	0%	1.2%	0%	1.9%	0%
Families with Children	35%	31%	36%	35%	43%	49%	36%	38%	44%	32%	43%	51%	49%	28%	54%	49%	45%
Poverty Index	45	68	89	60	41	7	26	7	20	13	9	10	5	82	10	2	2
School Proficiency Index	36	37	33	35	47	33	58	58	29	49	49	35	58	36	33	35	58
Transportation – Transit Trip Index	25	18	0	26	41	43	20	25	17	21	32	55	40	12	39	38	41
Low Transportation Costs Index	19	23	11	25	23	25	30	18	15	22	21	27	26	5	30	38	27
Job Proximity Index	66	53	39	65	73	51	82	87	39	94	73	69	88	96	75	85	84
Labor Market Index	70	39	77	43	49	34	29	6	28	6	12	8	3	0	19	1	3
Environmental Health Index	80	84	85	81	76	79	80	76	80	80	78	75	77	76	65	75	79
Average Index Score:	49	46	48	48	50	39	46	40	33	41	39	40	42	44	39	39	42

Data Source: 2022 ACS 5-year Estimates, detailed tables and HUD's Affirmatively Furthering Fair Housing Tool.

<sup>1</sup> Census Tracts 9, 21.02, 10, and 15 contain significant area outside of the Mansfield City limits.

<sup>2</sup> 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. 10 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.

*Poverty is perhaps the biggest risk for any population in accessing those things that can bring quality of life.*

## 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.

*Another important construct is the quality of education. Put another way, good schools matter.*

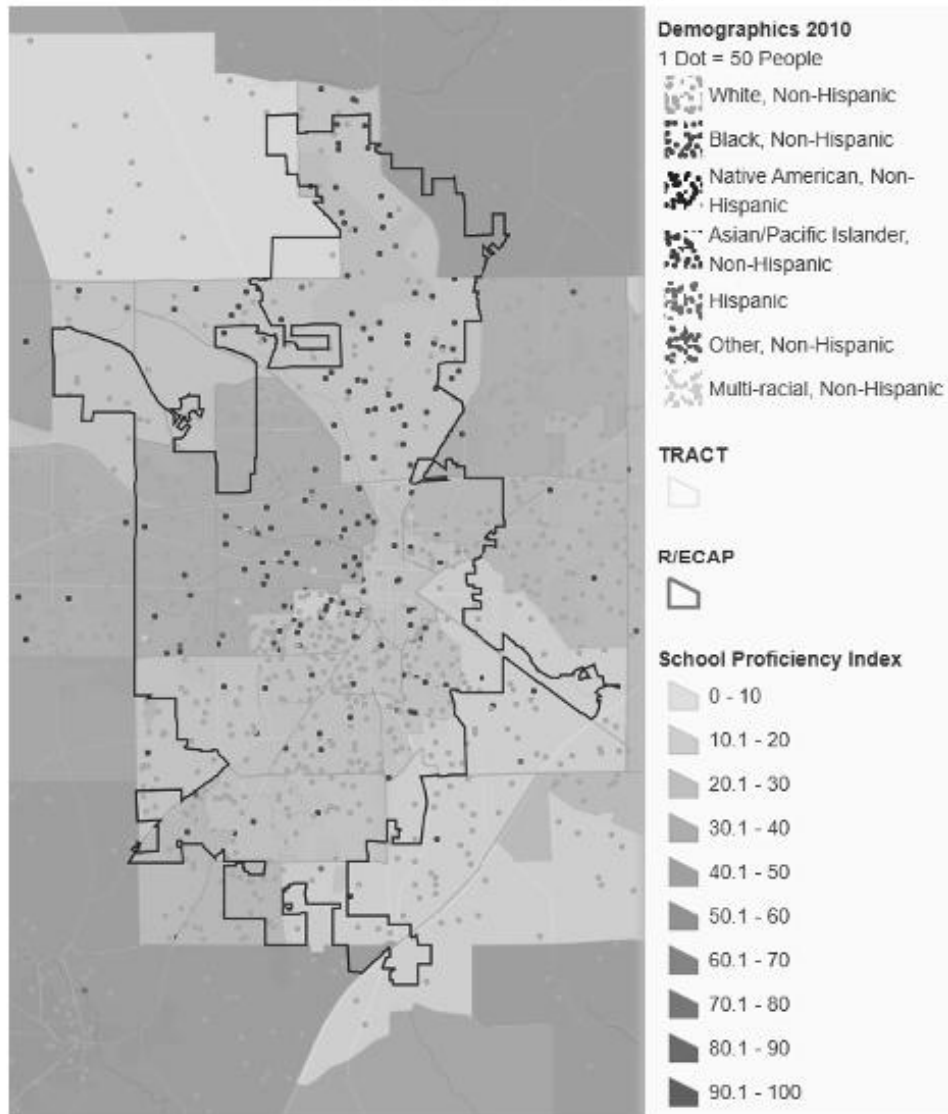
HUD has developed a school proficiency index, which we used in Table 4A. This school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe

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

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)*

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 also low as compared with the State of Ohio (see Tale 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.

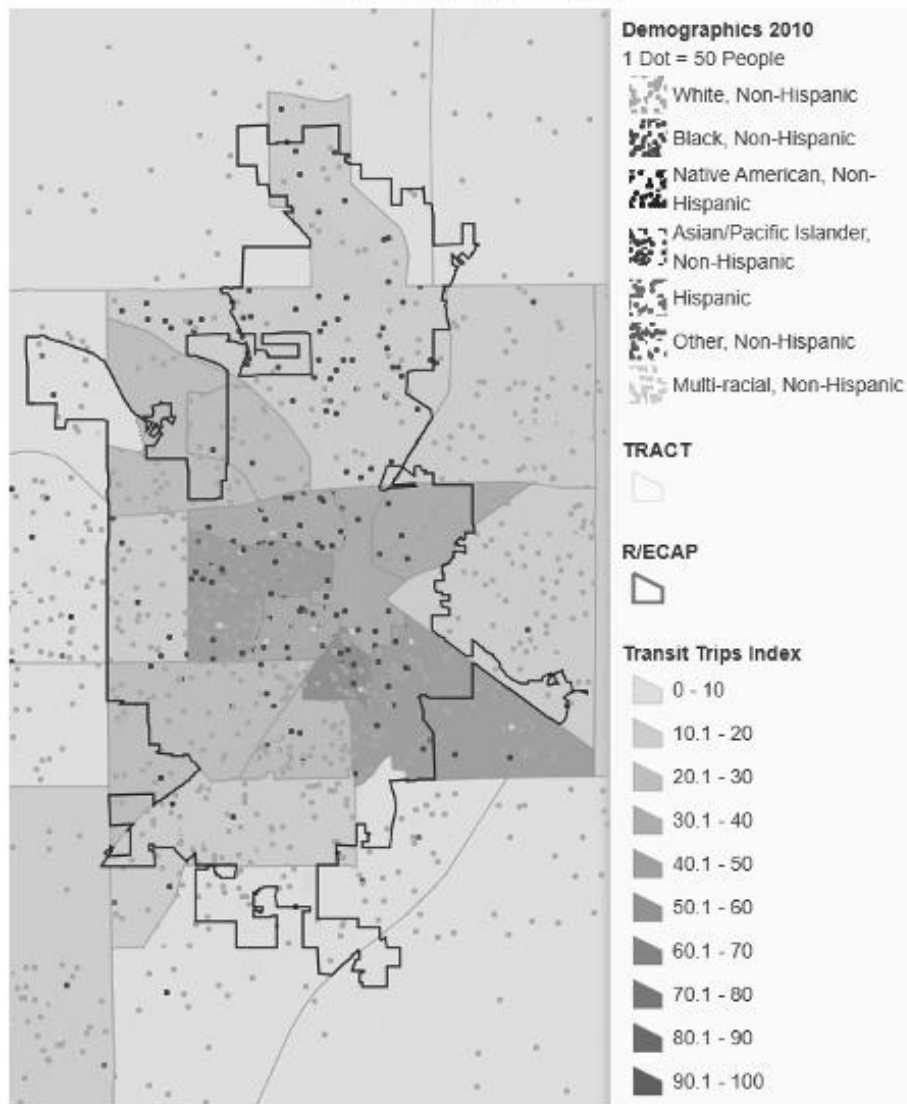
The second way that HUD measures transportation is with the Low Transportation Cost Index. This index is based on estimates of transportation costs for a family that meets the following description: a 3-person single-parent family with income at 50% of the median income for renters for the region.

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 29

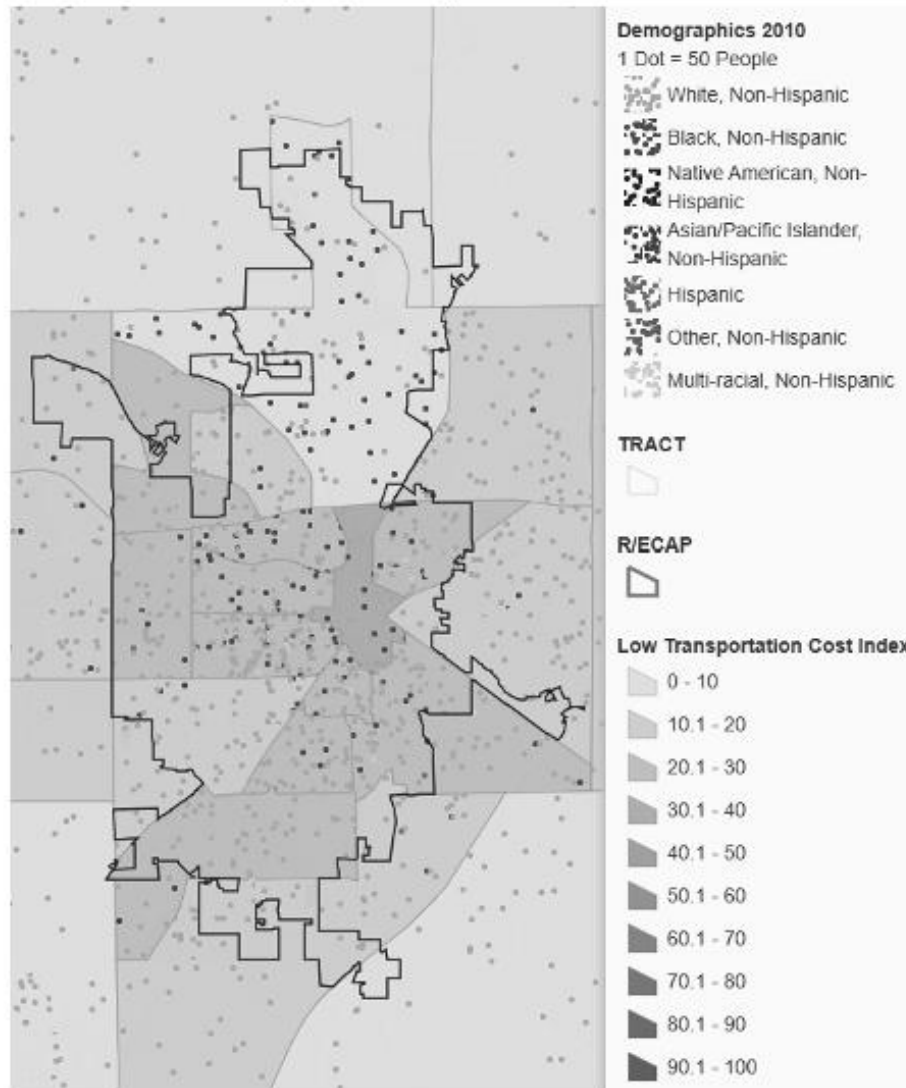
for the transit trip index, and 22.6 for the low transportation cost index. This shows a need for improvements in transportation in general Citywide. However, the scores for the high minority concentration census tracts were not low on either of these indices in comparison with the rest of the City.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

**Map 4C: Transit Trips Index**



Data source: HUD Enterprise Geospatial Information System (eGIS)

Map 4D Low Transportation Cost Index



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.

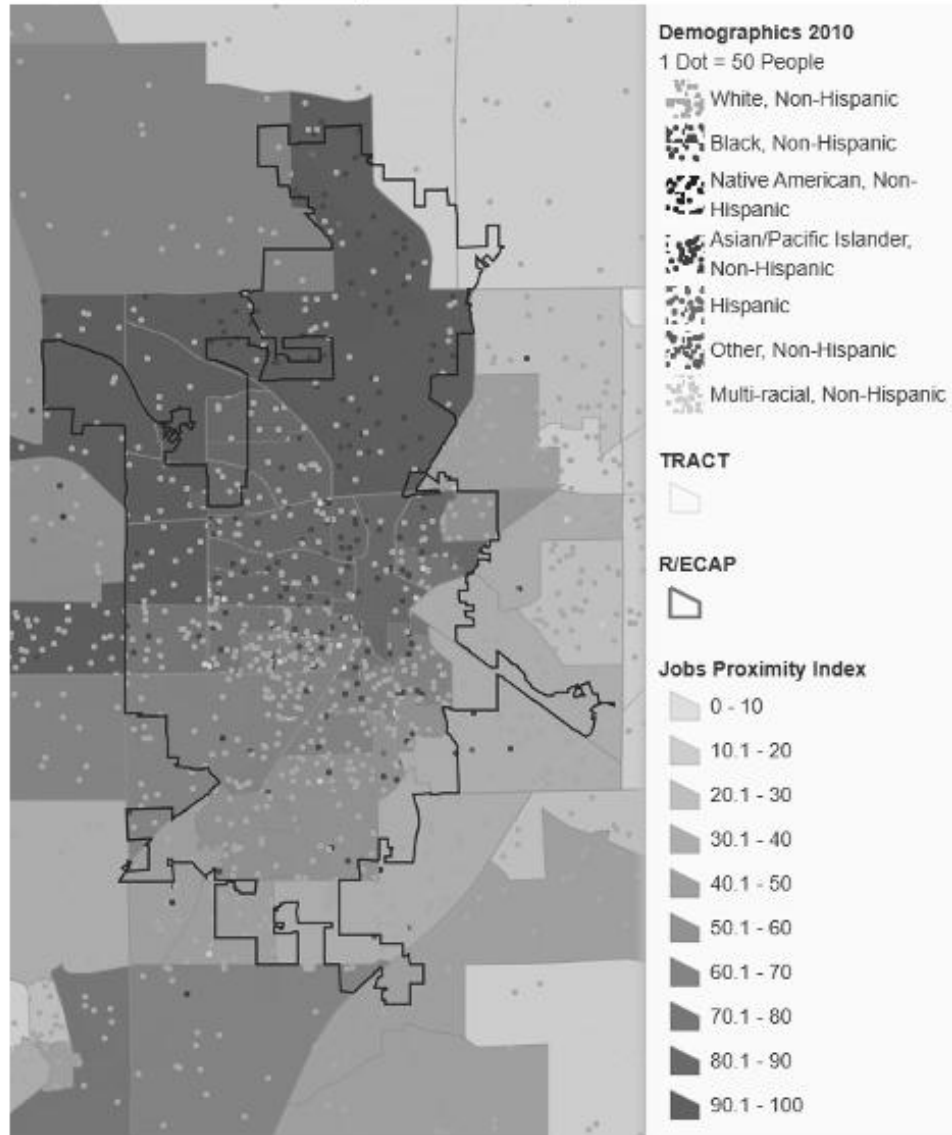
The second way that HUD measures employment opportunity is through the Labor Market Engagement Index. The labor market engagement index provides a summary description of the relative intensity of labor

*This indicates that people in these neighborhoods of concentration are quite disengaged from the workforce.*

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.

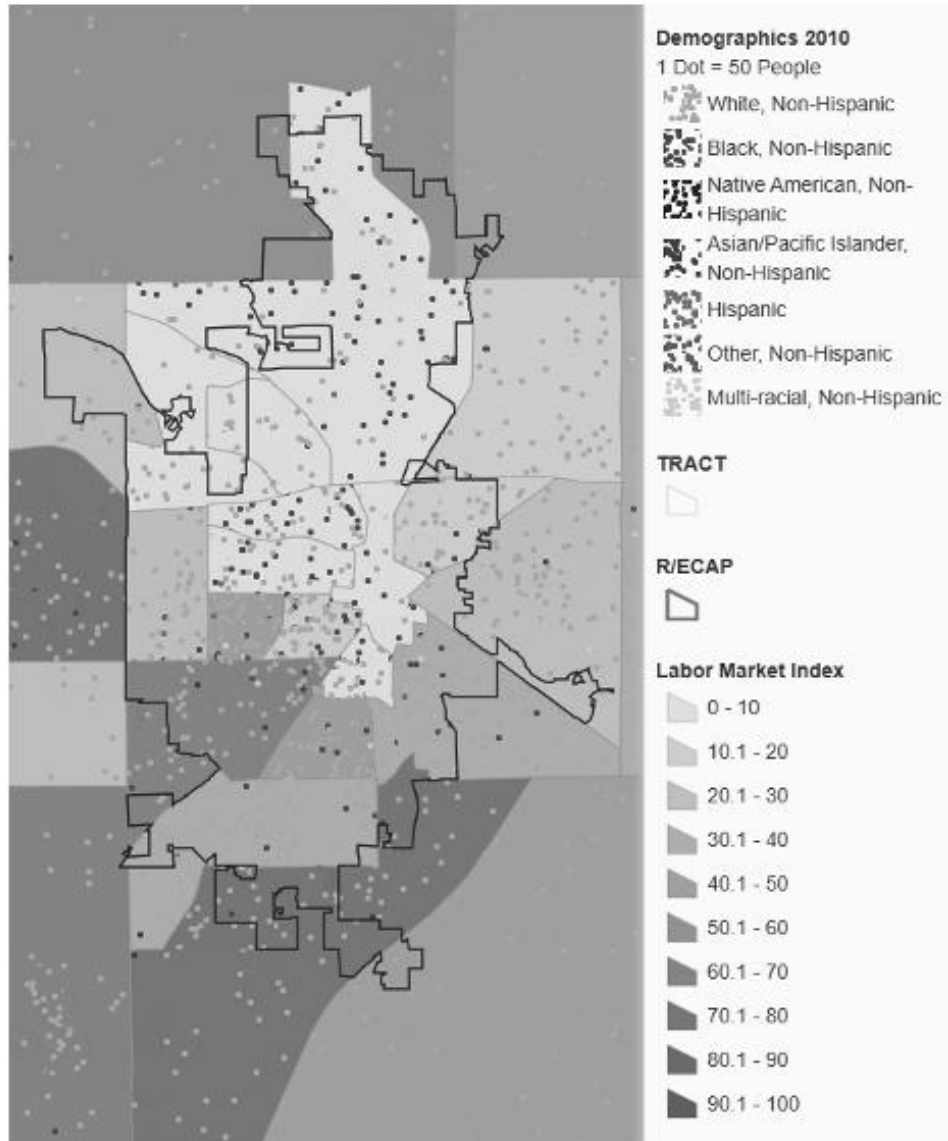
These indices demonstrate that good employment opportunities are potentially a significant factor for many of the households living in these areas of concentrated poverty and concentrations of protected classes. As shown in Table 4A, for the Job Proximity Index, two of the 17 census tracts had index scores below 40 (each scored 39). The Job 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

*Based on the indices ...  
...environmental health is  
a potential limiting factor  
to opportunity.*

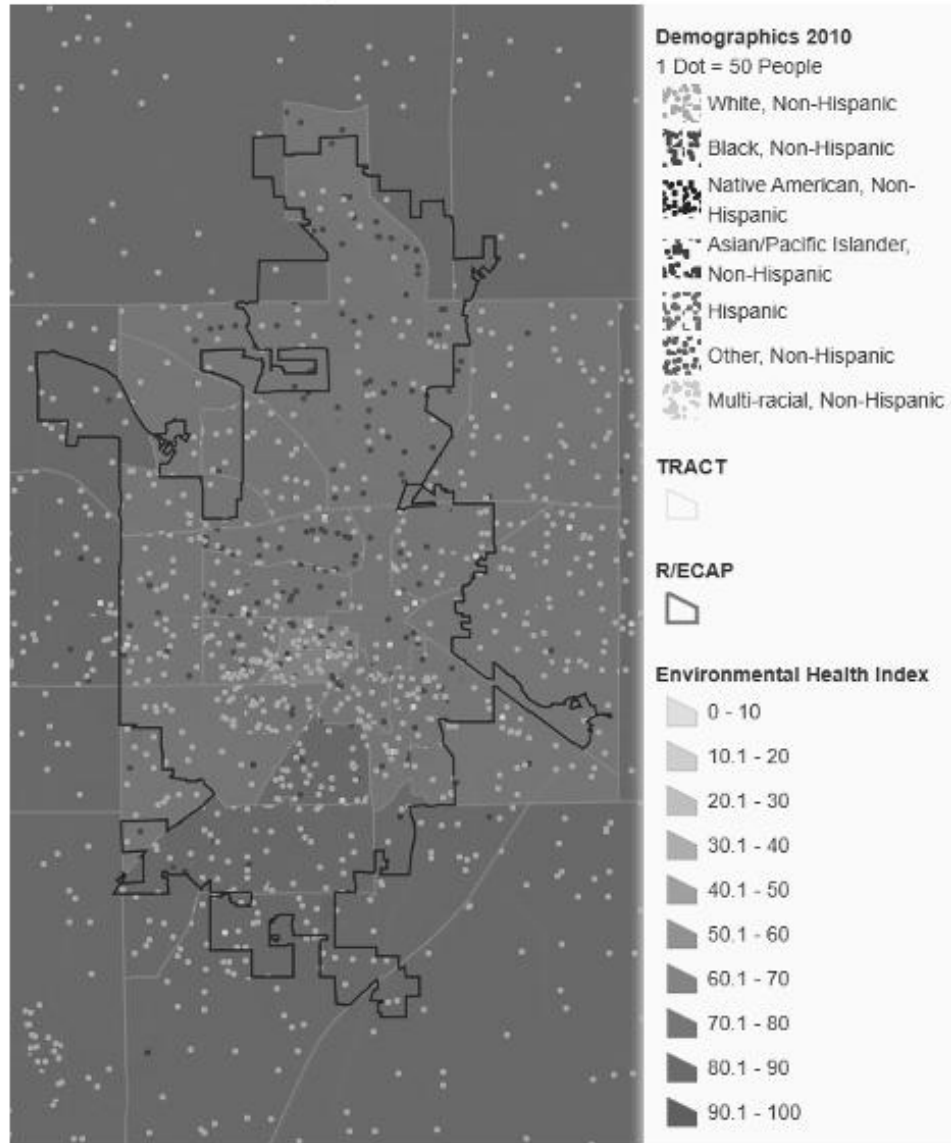
Environmental health is the last of the HUD factors that we assessed, as shown in Table 4A. The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The index is a linear combination of standardized EPA estimates of air quality carcinogenic, respiratory, 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 42. 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.

*Perhaps even more important than pinpointing the exact areas where opportunities are most limited, is identifying the types of limitations on opportunity.*

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 = 25.1)

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.

- 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

*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.*

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, 5,410 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 (78.5%) were built prior to 1980. 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 their 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

*Sun, water, friction, age and other factors all impact housing systems over time.*

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.

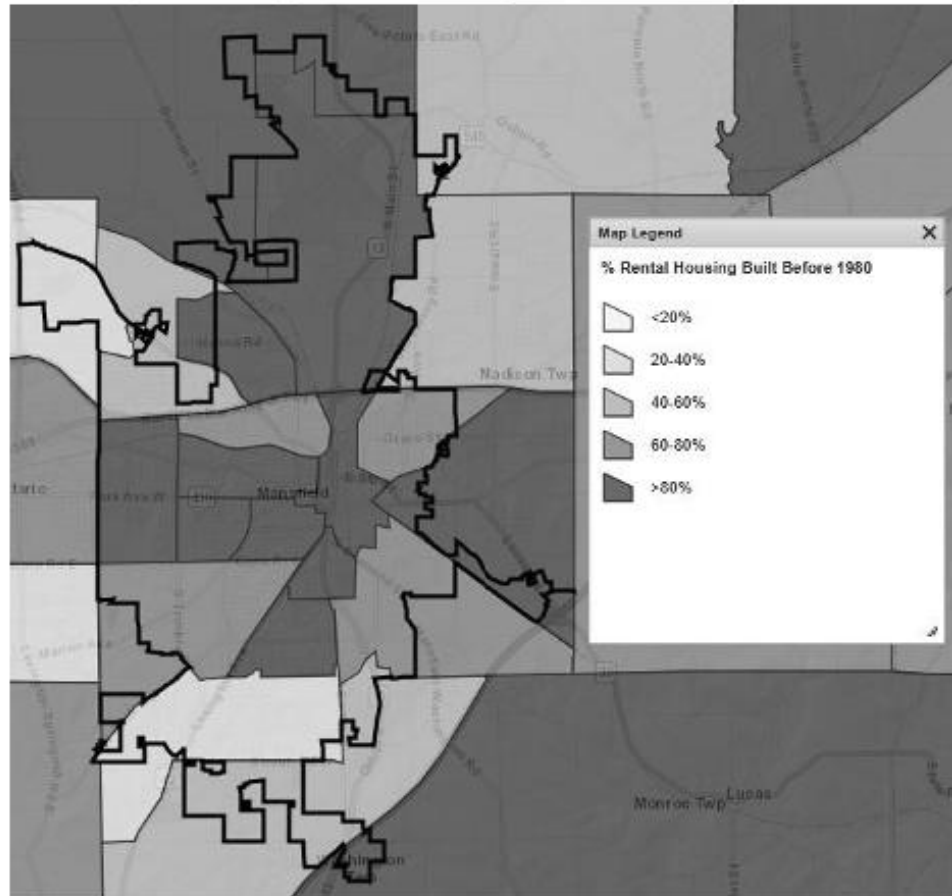
11.7% of all houses in the City of Mansfield are vacant. 80% of survey respondents identified vacant buildings as a significant problem in the City affecting the marketability of housing in the City.

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

*25.3% of these housing units were built prior to 1940, and 11.7% of all houses in the City of Mansfield are vacant.*

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: CPD 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.

*Blighted housing brings down surrounding 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.*

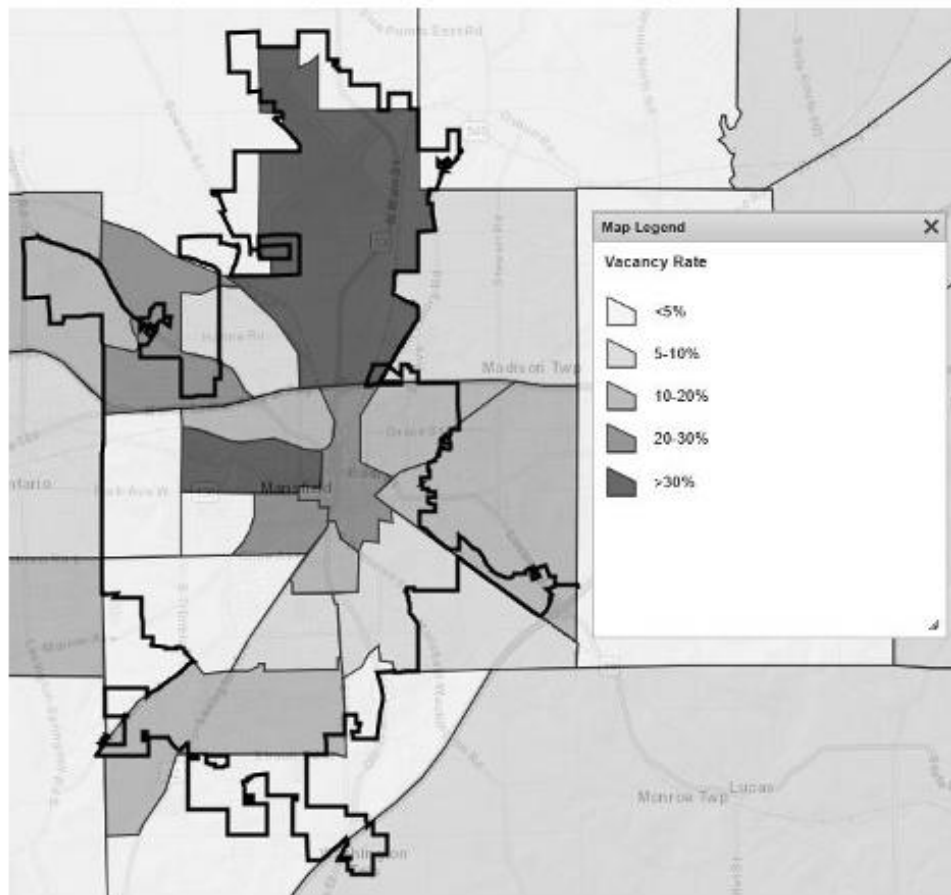
The need for improvements to the housing stock is directly connected with another important need, which is the removal of blighted housing. Not all housing is worth saving, and the blighted housing brings down surrounding

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. 1.1% of the households in the City had 1.01 to 1.50 occupants per room. .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: CPD 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.

*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.*

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 1980.

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 lmi occupied units are estimated to have children under 6. There are also an estimated 1,152 renter occupied units with lead hazards. Of those 661 units are occupied by low- and moderate-income households, and 123 of the lmi 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 lmi households	# units with hazard occupied by LMI households	% LMI units with hazard with children under 6	# LMI units with hazard with children under 6
Before 1940	Owner	2,390	90.0%	2,151	44.0%	946	23.0%	218	17.8%	39
	Renter	1,752	90.0%	1,577	44.0%	694	57.4%	398	17.8%	71
1940-59	Owner	3,600	80.0%	2,880	18.0%	518	23.0%	119	17.8%	21
	Renter	1,858	80.0%	1,486	18.0%	268	57.4%	154	17.8%	27
1960-79	Owner	2,063	62.0%	1,279	9.5%	122	23.0%	28	22.2%	6
	Renter	3,237	62.0%	2,007	9.5%	191	57.4%	109	22.2%	24
Total Owner		8,117		6,310		1,586		365		66
Total Renter		6,053		5,070		1,152		661		123
Total		14,180		11,380		2,738		1,026		189
% of total				77.2%		19.3%		6.7%		1.2%

\*\*Percent lead hazards 1960-79 units estimated, based on percent units with interior lead paint compared to 1940-59 (per HUD National Lead Paint Survey, 1991), and applying this ratio (44%) to 1940-59 percentage (44% \* 18% = 9.5%); other percentages from HUD Economic Analysis of HUD Rule on Lead Based Paint Hazards. Sources: Columns 1-3: 2022 ACS; Column 4: HUD 1990 National Survey on Lead-Based Paint; Columns 6: Eliminating Childhood Lead Poisoning, President's Task Force on Environmental Health Risks and Safety Risks to Children, 2000; Column 8: 2022 ACS; column 10: Eliminating Childhood Lead Poisoning, President's Task Force on Environmental Health Risks and Safety Risks to Children, 2000.

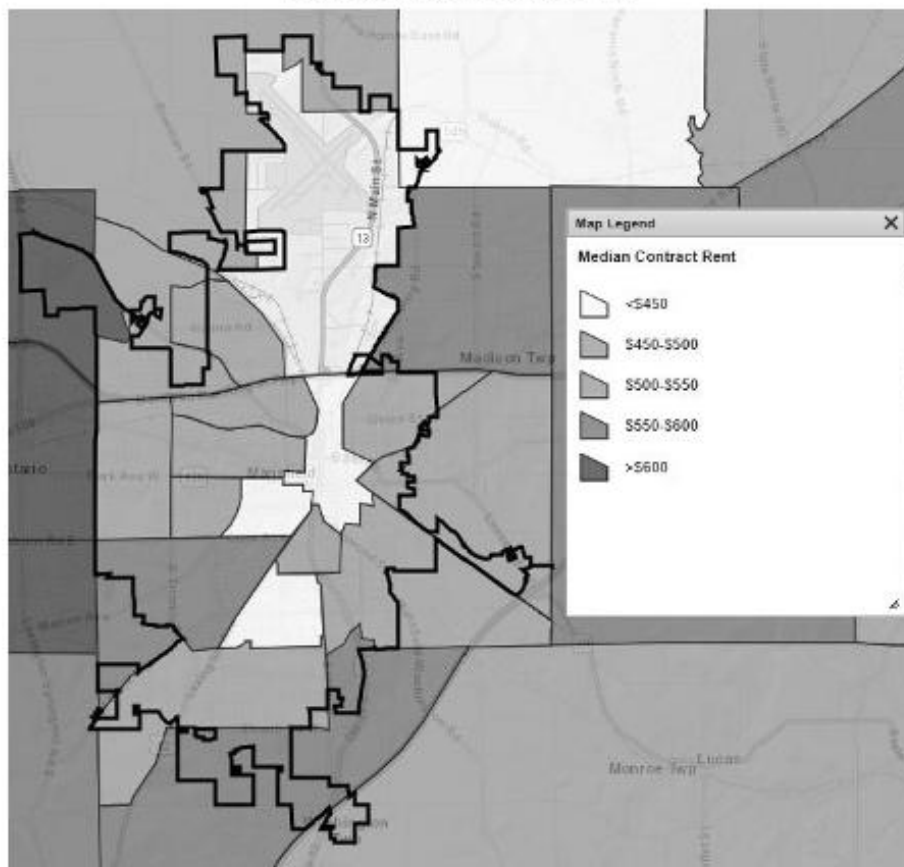
Housing is important, and the quality of housing matters both to the individuals and households residing there, and to the community in which the housing resides. There is a significant need for improvements to the housing stock within the City of Mansfield, which is aging, and which has not been consistently 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. 3,989 renter households under 80% of area median income are paying more than 30% of their income on housing; and 1,225 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.

*The biggest housing problem in the City at large is housing quality, followed by housing affordability.*

Map 5C: Median Contract Rent



Data source: CPD Maps

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	\$733	19.4%
Median Income	\$34,219	\$40,996	16.5%

*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 households income on housing, or on severe housing cost burden, paying more than 50% of a households income on housing.

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.

*For housing issues outside of affordability, we found disparate impacts on the Black/African American population and the Hispanic population at 50-100% of area median income, and for Asians at 0-50% of area median income. Hispanic households were also disproportionately impacted by having 0 or negative income at 0-30% of the area median income.*

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**

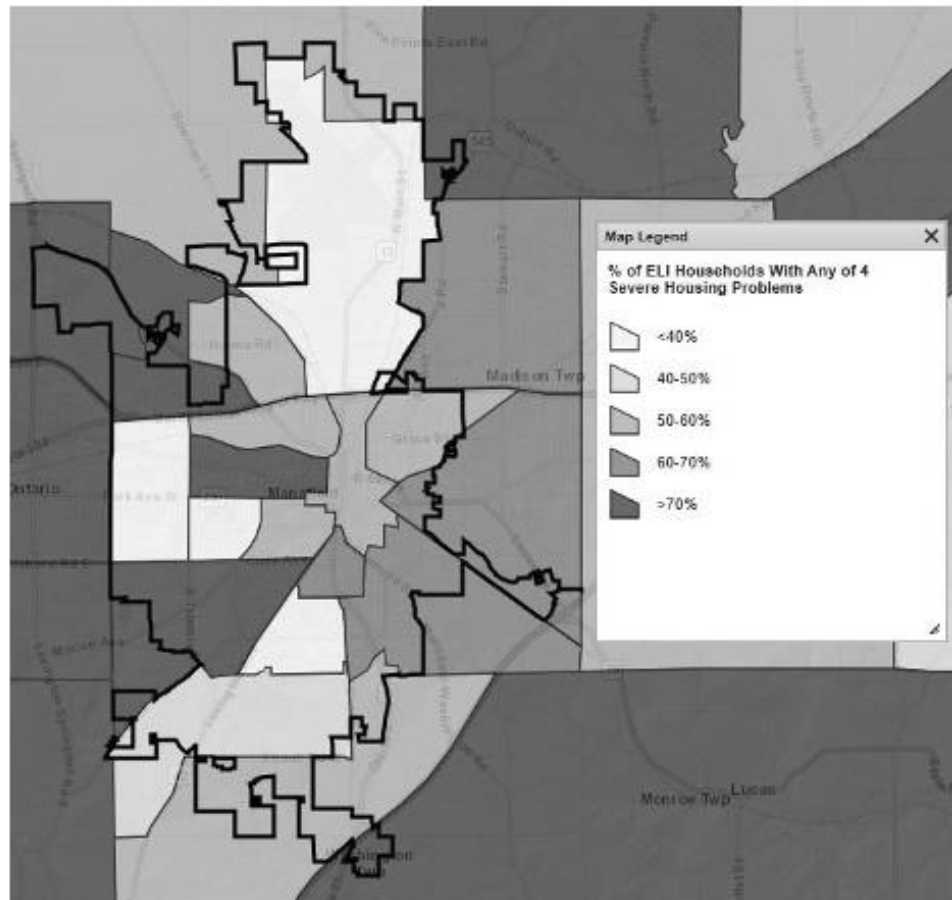
Race	One or more of 4 housing problems				One or more of 4 severe housing problems				Housing Cost Burdened			
	0-30%	30-50%	50-80%	80-100%	0-30%	30-50%	50-80%	80-100%	0-30%	30-50%	Over 50%	No income
White												
Black/African American			X	X								
Asian	X					X						
American Indian, Alaska Native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

Data source: 2018 ACS

\*this is a double count of households with 0, or negative income.

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

*Renters are affected disproportionately by a number of these housing problems.*

As described above, renters are affected disproportionately by a number of these housing problems. For example, renters are

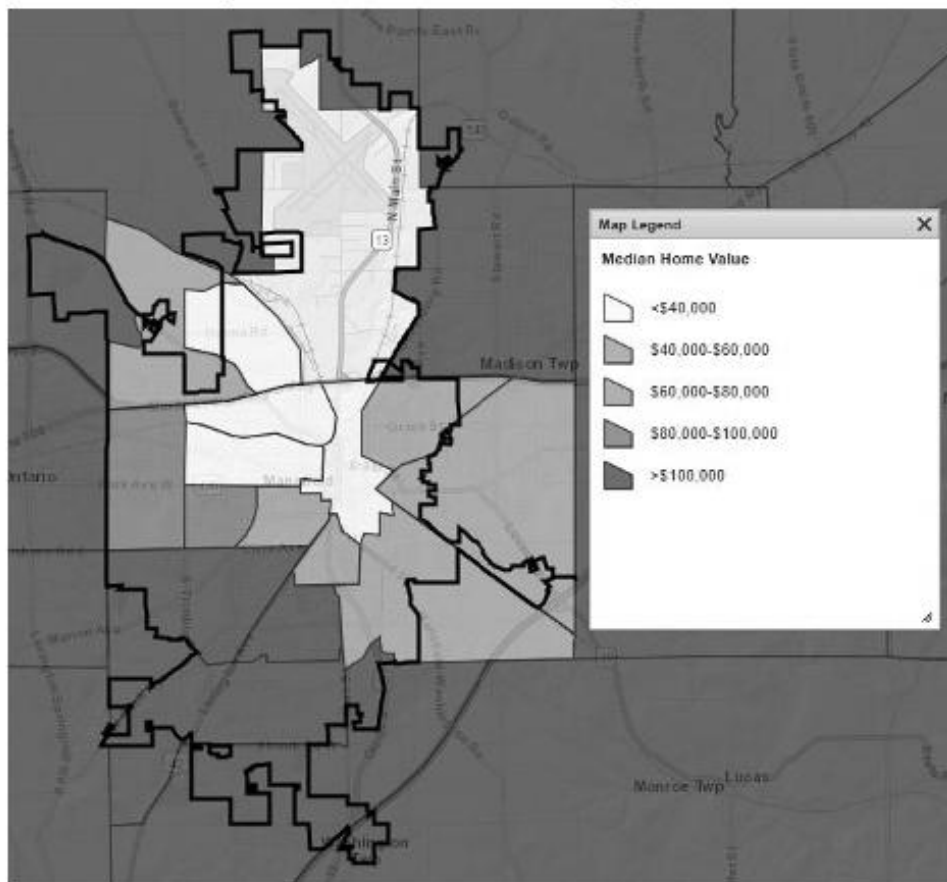
more likely to be severely housing cost burdened, more likely to live in older, less well-maintained housing units, more likely to have inadequate income, and more likely to be

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: CPD Maps

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.consumerfinance.gov/data-research/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.

*There remain disparities between the percentage of approvals for loans for white households and for minority households.*

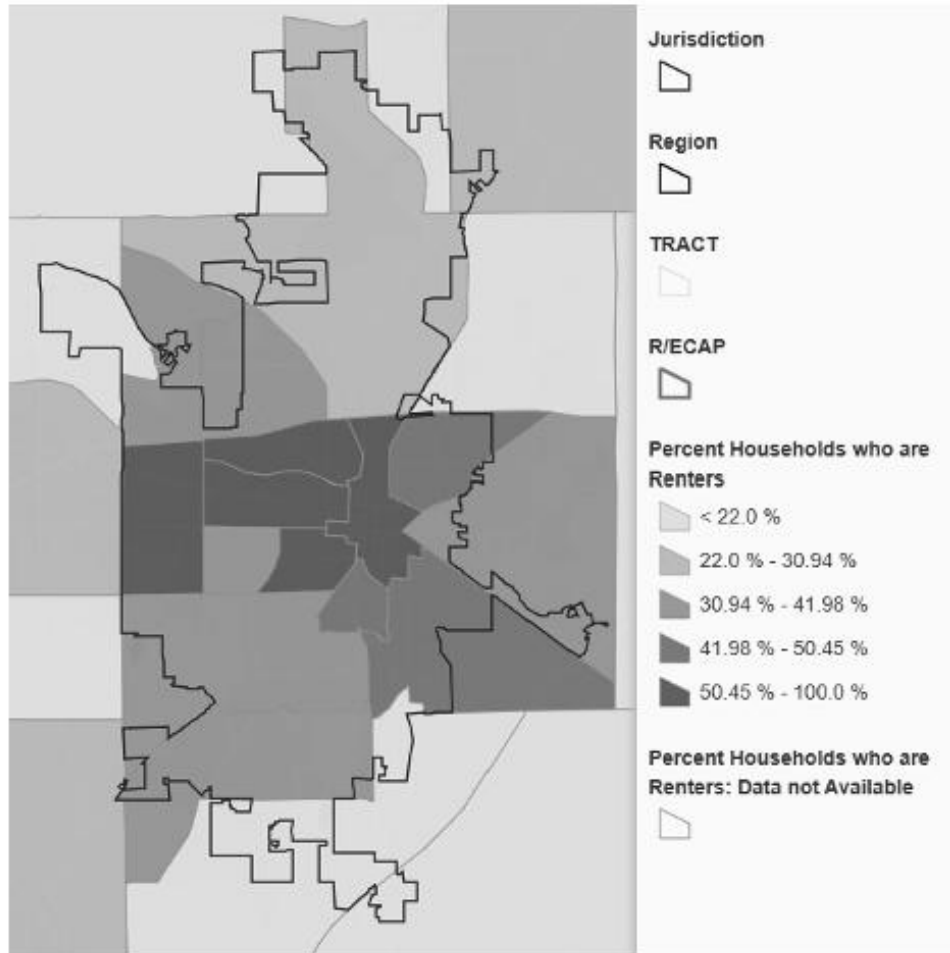
### Rental Housing

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.

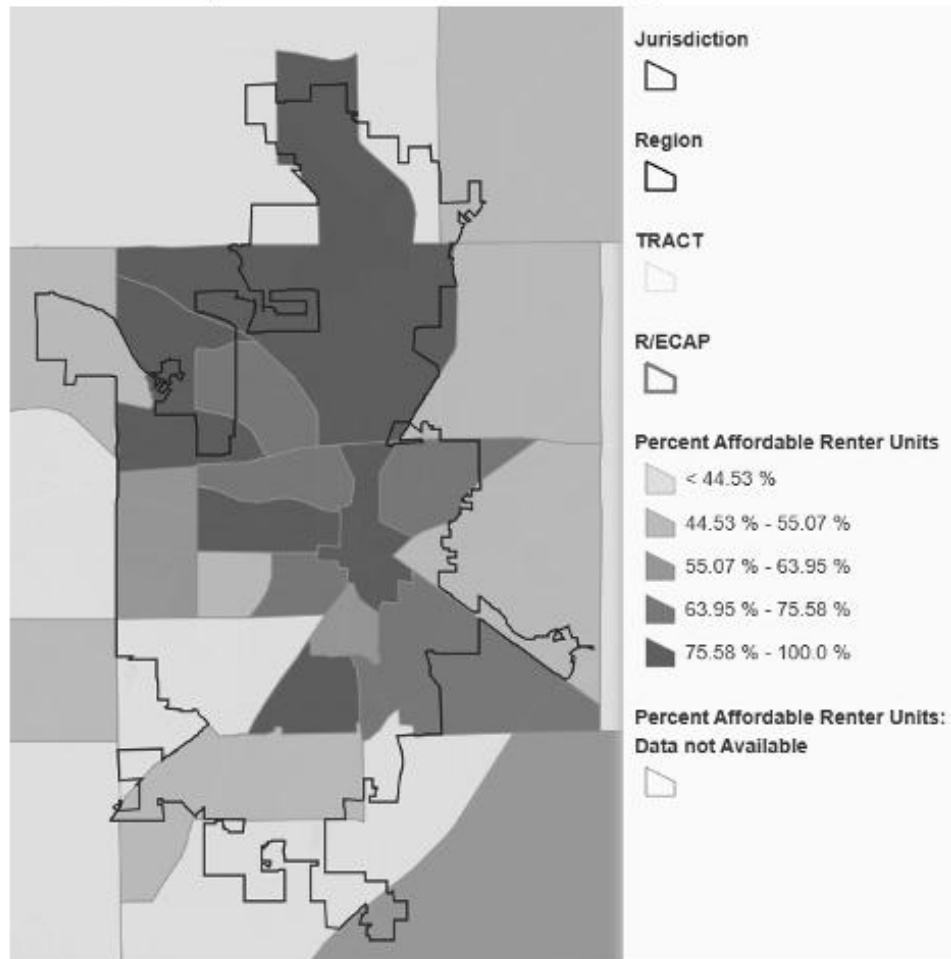
The average monthly rent for a house in the City of Mansfield is \$733. In order to afford to pay this monthly rent, a household would need to earn \$29,320 per year. Over 1/3 of City residents could not afford to pay this rent. Considering that many of the homes below these values are in poor condition, 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: HUD 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.

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 Choice

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.

*A basic premise of all housing markets is that there should be a spectrum of housing choices and opportunities for residents.*

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.

- 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.
 

*Racial minorities and households with children continue to face disadvantages in the housing market.*
- 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.
 

*Overcrowding is a problem for some households in the City. This is particularly a problem for larger households with children.*

  - 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.
  - Lot sizes are often small, making infill development challenging.
  - Aging infrastructure such as water, sewer, and streets can also be a barrier to development.

- 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 5E: 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	33.9%

*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 multifamily rental units (96). There are also 12 HUD multifamily projects, with 518 total units (Table 6B). There are 15 Low Income Housing Tax Credit Projects in the City, with 1,667 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	96

*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
Homestead Place	24
Mansfield Memorial Homes Apartments	86 total/49 assisted
West Park Senior Center	73
Friendship Manor	22
Applewood Place Apartments II	51 total/50 assisted
<b>Total:</b>	<b>280</b>

*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.

*Many of the HUD and LIHTC units are old and need to be replaced.*

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

*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.*

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 III	30	2005
Mansfield Homes IV	30, 24 low-income	2003
Mansfield Homes V	30, 25 low-income	2007
Blymer Apartments	43	1992
Logan Place	45	2013
Malabar Trace I	32	1997
<b>Total:</b>	<b>210</b>	

*Data Source: CPD 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 protocol 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,

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.

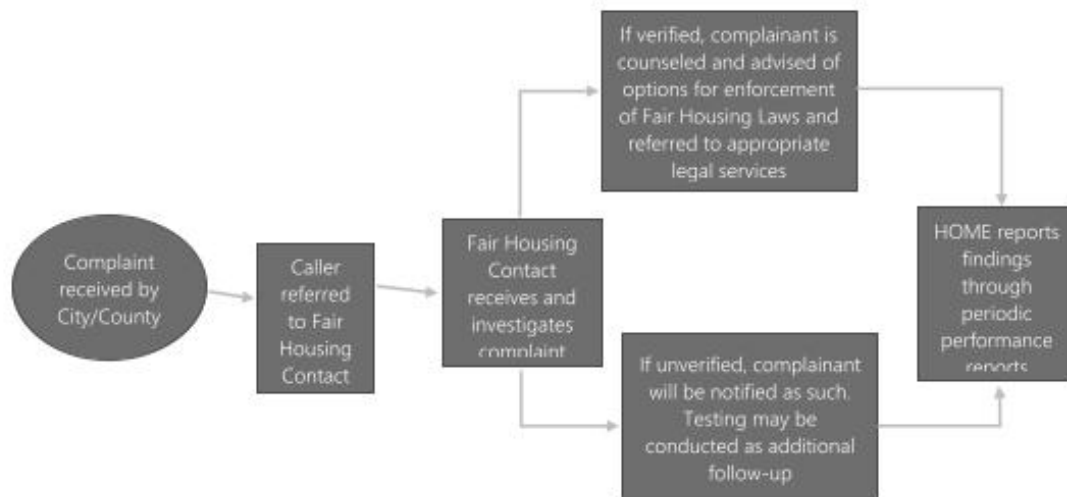
- **Testing**

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 fielded through the identified department are handled as follows:

City of Mansfield Fair Housing Complaint Flow Chart



## 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 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 AI. While these impediments may exist, only those verified through local data were included as findings in this AI. 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

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.

- 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 4B). 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 (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).

#### **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.

<b>Impediment I:</b> There is a shortage of decent rental housing choices across the City		
<b>Goal I:</b> Improve the availability of quality rental housing through activities to foster improvement of the housing stock and/or to develop additional rental housing units.		
<b>Desired Outcome:</b> 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"> <li>City of Mansfield Community Development Department</li> </ul>	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"> <li>Local government officials</li> <li>Richland County MHA</li> </ul>	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"> <li>City of Mansfield Community Development Department</li> <li>Richland County MHA</li> </ul>	2024-2029

<b>Impediment II: High housing costs limits choice</b>		
<b>Goal II: Improve housing choice through increased affordability</b>		
<b>Desired Outcome:</b> More affordable housing options will exist for minorities, families with children, and others with current limited economic means and access.		
<b>Fair Housing Goals/ Activities</b>	<b>Responsible Party</b>	<b>Timeline</b>
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"> <li>City of Mansfield Community Development Department</li> <li>Richland County MHA</li> </ul>	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"> <li>City of Mansfield Community Development Department</li> <li>Social services agencies</li> <li>Local colleges and career centers</li> </ul>	2024-2029

<b>Impediment III:</b> Neighborhoods with affordable housing options provide low access to opportunity		
<b>Goal III:</b> Improve access to opportunity for households in constrained neighborhoods		
<b>Desired Outcome:</b> Access to opportunities will be improved for households currently living in neighborhoods where opportunities are constrained.		
<b>Fair Housing Goals/ Activities</b>	<b>Responsible Party</b>	<b>Timeline</b>
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 B.	<ul style="list-style-type: none"> <li>City of Mansfield Community Development Department</li> <li>Local school districts</li> <li>Social service agencies</li> </ul>	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"> <li>Social service agencies</li> <li>Local government officials.</li> <li>Richland County RPA</li> </ul>	2024-2029
H. Seek to improve environmental health through testing of children for Ibp blood levels, education, and support of Goal A.	<ul style="list-style-type: none"> <li>Health department - primary</li> <li>Social service agencies – referrals to Health Dept.</li> <li>City of Mansfield Community Development Department - referrals to Health Dept.</li> </ul>	2024-2029

<b>Impediment IV:</b> Minority households have reduced access to homeownership		
<b>Goal IV:</b> To improve access to homeownership for minorities and other disadvantaged groups.		
<b>Desired Outcome:</b> To see homeownership rates improved for minorities and other disadvantaged groups.		
<b>Fair Housing Goals/ Activities</b>	<b>Responsible Party</b>	<b>Timeline</b>
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 cleanup, and counseling.	<ul style="list-style-type: none"> <li>City of Mansfield Community Development Department</li> <li>Local housing agencies</li> </ul>	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"> <li>City of Mansfield Community Development Department</li> </ul>	2024-2029

<b>Impediment V:</b> Persistent poverty is a core element, and must be directly addressed to resolve the other identified barriers.		
<b>Goal V:</b> 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.		
<b>Desired Outcome:</b> 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"> <li>City of Mansfield Community Development Department</li> <li>Richland County RPA</li> <li>Local Chamber</li> <li>Local service providers</li> </ul>	2024-2029
L. Improve the availability of transportation to good paying jobs at the times needed.	<ul style="list-style-type: none"> <li>Richland County RPA</li> <li>City of Mansfield Community Development Department</li> <li>Local service providers</li> </ul>	2024-2029
M. Improve labor market engagement, particularly in high minority concentration areas. <ol style="list-style-type: none"> <li>Support goals E, F, and G.</li> <li>Provide additional support for those with disabilities to encourage participation in the workforce, where possible.</li> </ol>	<ul style="list-style-type: none"> <li>Social service agencies</li> <li>Local government officials.</li> <li>Richland County RPA</li> <li>Local service providers</li> </ul>	2024-2029


<b>Impediment VI:</b> There is a continued need for fair housing outreach, education, and enforcement		
<b>Goal VI:</b> To educate people in the City of Mansfield on fair housing, particularly lenders, real estate professionals, property owners, and those in protected groups.		
<b>Desired Outcome:</b> 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
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"> <li>City of Mansfield Community Development Department</li> <li>Local housing agencies</li> </ul>	2024-2029
O. Enforce the fair housing laws, and conduct testing, as needed.	<ul style="list-style-type: none"> <li>City of Mansfield Community Development Department</li> <li>Local housing agencies</li> </ul>	2024-2029

## Grantee SF-424's and Certification(s)

OMB Number: 4840-0044  
Expiration Date: 11/30/2025


Application for Federal Assistance SF-424		
<p>* 1. Type of Submission:</p> <p><input type="checkbox"/> Preapplication</p> <p><input checked="" type="checkbox"/> Application</p> <p><input type="checkbox"/> Changed/Corrected Application</p>		
<p>* 2. Type of Application:</p> <p><input checked="" type="checkbox"/> New</p> <p><input type="checkbox"/> Continuation</p> <p><input type="checkbox"/> Revision</p>		
<p>* If Revision, select appropriate letter(s):</p> <p><input type="text"/></p> <p>* Other (Specify):</p> <p><input type="text"/></p>		
<p>* 3. Date Received:</p> <p>05/24/2025</p>		<p>4. Applicant Identifier:</p> <p><input type="text"/></p>
<p>5a. Federal Entity Identifier:</p> <p>34-C001795</p>		<p>5b. Federal Award Identifier:</p> <p><input type="text"/></p>
<p>State Use Only:</p>		
<p>6. Date Received by State:</p> <p><input type="text"/></p>		<p>7. State Application Identifier:</p> <p><input type="text"/></p>
<p>8. APPLICANT INFORMATION:</p>		
<p>* a. Legal Name: The City of Mansfield</p>		
<p>* b. Employer/Taxpayer Identification Number (EIN/TIN):</p> <p>34-5001795</p>		<p>* c. UFI:</p> <p>330XW5XZ0MUR0</p>
<p>d. Address:</p>		
<p>* Street1: 30 North Diamond Street</p>		
<p>Street2: <input type="text"/></p>		
<p>* City: Mansfield</p>		
<p>County/Parish: <input type="text"/></p>		
<p>* State: OH: Ohio</p>		
<p>Province: <input type="text"/></p>		
<p>* Country: USA: UNITED STATES</p>		
<p>* Zip / Postal Code: 44302-1702</p>		
<p>e. Organizational Unit:</p>		
<p>Department Name:</p> <p><input type="text"/></p>		<p>Division Name:</p> <p><input type="text"/></p>
<p>f. Name and contact information of person to be contacted on matters involving this application:</p>		
<p>Prefix: Mr.</p>		<p>* First Name: Julie</p>
<p>Middle Name: <input type="text"/></p>		
<p>* Last Name: Perry</p>		
<p>Suffix: <input type="text"/></p>		
<p>Title: Mayor, City of Mansfield</p>		
<p>Organizational Affiliation:</p> <p><input type="text"/></p>		
<p>* Telephone Number: 419-755-9826</p>		<p>Fax Number: <input type="text"/></p>
<p>* Email: jperry@ci.mansfield.oh.us</p>		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="C: City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="The US Department of Housing and Urban Development"/>	
<b>11. Assistance Listing Number:</b> <input type="text"/>	
<b>Assistance Listing Title:</b> <input type="text"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="B-25-MC-39-E0117"/>	
<b>* Title:</b> <input type="text" value="This is a CDBG grant for the Entitlement Participating Jurisdiction of Mansfield, Ohio."/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="This funding will assist the office of Permitting and Development with the funding of CDBG services in the amount of \$956,204.00"/>	
<b>Attach supporting documents as specified in agency instructions.</b> <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="CV-12"/>	* b. Program/Project: <input type="text" value="CF-12"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2025"/>	* b. End Date: <input type="text" value="06/30/2026"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="950,234.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="133,106.64"/>
* g. TOTAL	<input type="text" value="991,310.64"/>
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an Internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Cecilia"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Derry"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Mayor, City of Mansfield"/>	
* Telephone Number: <input type="text" value="413-755-3526"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="jderry@city.mansfield.ma.us"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="06/24/2025"/>

Application for Federal Assistance SF-424			
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
		<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>	
<b>* 3. Date Received:</b> <input type="text"/>		<b>4. Applicant Identifier:</b> <input type="text"/>	
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> <input type="text"/>	
<b>State Use Only:</b>			
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>			
<b>* a. Legal Name:</b> <input type="text"/>			
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text"/>		<b>* c. UEI:</b> <input type="text"/>	
<b>d. Address:</b>			
<b>* Street1:</b> <input type="text"/>		<b>* Street2:</b> <input type="text"/>	
<b>* City:</b> <input type="text"/>		<b>* County/Parish:</b> <input type="text"/>	
<b>* State:</b> <input type="text"/>		<b>* Province:</b> <input type="text"/>	
<b>* Country:</b> <input type="text"/>		<b>* Zip/Postal Code:</b> <input type="text"/>	
<b>e. Organizational Unit:</b>			
<b>Department Name:</b> <input type="text"/>		<b>Division Name:</b> <input type="text"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>			
<b>Prefix:</b> <input type="text"/>		<b>* First Name:</b> <input type="text"/>	
<b>Middle Name:</b> <input type="text"/>		<b>* Last Name:</b> <input type="text"/>	
<b>Suffix:</b> <input type="text"/>		<b>Title:</b> <input type="text"/>	
<b>Organizational Affiliation:</b> <input type="text"/>			
<b>* Telephone Number:</b> <input type="text"/>		<b>Fax Number:</b> <input type="text"/>	
<b>* Email:</b> <input type="text"/>			

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="The US Department of Housing and Urban Development"/>	
<b>11. Assistance Listing Number:</b> <input type="text"/>	
<b>Assistance Listing Title:</b> <input type="text"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="H-25-MC-39-0321"/>	
<b>* Title:</b> <input type="text" value="This is a HOME grant for the Entitlement Participating Jurisdiction of Mansfield, Ohio."/>	
<b>13. Competition Identification Number:</b> <input type="text"/>	
<b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <div> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="This funding will assist the office of Permitting and Development with the funding of HOME services in the amount of \$129,092.00"/>	
Attach supporting documents as specified in agency instructions. <div> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="00-12"/>	* b. Program/Project: <input type="text" value="00-12"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2025"/>	* b. End Date: <input type="text" value="06/30/2025"/>
18. Estimated Funding (\$):	
* a. Federal	<input type="text" value="329,092.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="74,280.74"/>
* g. TOTAL	<input type="text" value="403,372.74"/>
19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text"/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
<small>** The list of certifications and assurances, or an internal site where you may obtain this list, is contained in the announcement or agency specific instructions.</small>	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Jonie"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Perry"/>	
Suffix: <input type="text"/>	
* Title: <input type="text" value="Mayor, City of Mansfield"/>	
* Telephone Number: <input type="text" value="216-755-9620"/>	Fax Number: <input type="text"/>
* Email: <input type="text" value="jperry@cityofmansfield.oh.us"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="06/24/2025"/>

**Applicant and Recipient  
Assurances and Certifications**

U.S. Department of Housing  
and Urban Development

OMB Number: 2501-0046  
Expiration Date: 02/28/2027

**Instructions for the HUD 424-B Assurances and Certifications**

As part of your application for HUD funding, you, as the official authorized to sign on behalf of your organization or as an individual, must provide the following assurances and certifications. The Responsible Civil Rights Official has specified this form for use for purposes of general compliance with 24 CFR §§ 1.3, 3.115, 8.50, and 146.25, as applicable. The Responsible Civil Rights Official may require specific civil rights assurances to be furnished consistent with those authorities and will specify the form on which such assurances must be made. A failure to furnish or comply with the civil rights assurances contained in this form may result in the procedures to effect compliance at 24 CFR §§ 1.3, 3.115, 8.57, or 146.39.

By submitting this form, you are stating that all assertions made in this form are true, accurate, and correct.

As the duly representative of the applicant, I certify that the applicant (Insert below the Name and title of the Authorized Representative, name of Organization and the date of signature):

\*Authorized Representative Name: Jodie A. Perry

\*Title: Mayor

\*Applicant/Recipient Organization: City of Mansfield

1. Has the legal authority to apply for Federal assistance, has the institutional, managerial and financial capability (including funds to pay the non-Federal share of program costs) to plan, manage and complete the program as described in the application and the governing body has duly authorized the submission of the application, including these assurances and certifications, and authorized me as the official representative of the application to act in connection with the application and to provide any additional information as may be required.

2. Will administer the grant in compliance with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000(d)) and implementing regulations (24 CFR part 1), which provide that no person in the United States shall, on the grounds of race, color or national origin, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance OR if the applicant is a Federally recognized Indian tribe or its tribally designated housing entity, is subject to the Indian Civil Rights Act (25 U.S.C. 1301-1303).

3. Will administer the grant in compliance with Section 504 of the Rehabilitation Act of 1973 (28 U.S.C. 794), as amended, and implementing regulations at 24 CFR part 8, the American Disabilities Act (42 U.S.C. §§ 12101 et seq.), and implementing regulations at 28 CFR part 36 or 38, as applicable, and the Age Discrimination Act of 1975 (42 U.S.C. 5101-07) as amended, and implementing regulations at 24 CFR part 146 which together provide that no person in the United States shall, on the grounds of disability or age, be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any program or activity that receives Federal financial assistance; except if the grant program authorizes or limits participation to designated populations, then the applicant will comply with the nondiscrimination requirements within the designated population.

4. Will comply with the Fair Housing Act (42 U.S.C. 3601-19), as amended, and the implementing regulations at 24 CFR part 100, which prohibit discrimination in housing on the basis of race, color, religion, sex, disability, familial status, or national origin and will affirmatively further fair housing; except an applicant which is an Indian tribe or its instrumentality which is excluded by statute from coverage does not make this certification; and further except if the grant program authorizes or limits participation to designated populations, then the applicant

will comply with the nondiscrimination requirements within the designated population.

5. Will comply with all applicable Federal nondiscrimination requirements, including those listed at 24 CFR §§ 5.105(a) and 5.106 as applicable.

6. Will not use Federal funding to promote diversity, equity, and inclusion (DEI) mandates, policies, programs, or activities that violate any applicable Federal anti-discrimination laws.

7. Will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601) and implementing regulations at 49 CFR part 24 and, as applicable, Section 104(d) of the Housing and Community Development Act of 1974 (42 U.S.C. 5304(d)) and implementing regulations at 24 CFR part 42, subpart A.

8. Will comply with the environmental requirements of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and realize Federal authorities prior to the commitment or expenditure of funds for property.

9. That no Federal appropriated funds have been paid, or will be paid, by or on behalf of the applicant, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress, in connection with the awarding of this Federal grant or its extension, renewal, amendment or modification. If funds other than Federal appropriated funds have or will be paid for influencing or attempting to influence the persons listed above, I shall complete and submit Standard Form-LLL, Disclosure Form to Report Lobbying. I certify that I shall require all subawards at all tiers (including sub-grants and contracts) to similarly certify and disclose accordingly. Federally recognized Indian Tribes and tribally designated housing entities (TDHEs) established by Federally-recognized Indian tribes as a result of the exercise of the tribe's sovereign power are excluded from coverage by the Byrd Amendment, but State-recognized Indian tribes and TDHEs established under State law are not excluded from the statute's coverage.

I/We, the undersigned, certify under penalty of perjury that the information provided above is true, accurate, and correct. **WARNING:** Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(1)(iii)).

\* Signature: Jodie A. Perry

\* Date: (mm/dd/yyyy): 6/26/25

Form HUD 424-B (1/27/2023)

**Public Reporting Burden Statement:** The public reporting burden for this collection of information is estimated to average 0.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7<sup>th</sup> St. SW, Room 4176, Washington, DC 20410-5000. Do not send completed HUD 424-B forms to this address. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. The Department of Housing and Urban Development is authorized to collect this information under the authority cited in the Notice of Funding Opportunity for this grant program. The information collected provides assurances and certifications for legal requirements related to the administration of this grant program. HUD will use this information to ensure compliance of its grantees. This information is required to obtain the benefit sought in the grant program. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552).

Form HUD 424-B (10/27/2021)

## Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

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

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

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

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. **Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2023, 2024, 2025 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

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

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

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

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

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

  
Signature of Authorized Official

6/20/25  
Date

Mayor  
Title

**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Title

### Specific HOME Certifications

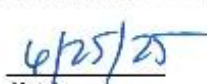
The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

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

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

  
\_\_\_\_\_  
Signature of Authorized Official

  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Title

## **APPENDIX TO CERTIFICATIONS**

### **INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

#### **Lobbying Certification**

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

## CERTIFICATIONS

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

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

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

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

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

6/24/25  
Date

Mayor  
Title

## HOME-ARP

# The City of Mansfield, Ohio



# HOME-ARP Allocation Plan

December, 2022

Prepared with the assistance of



## 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:

- CoC(s) 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
<b>Catholic Charities</b>	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 <sup>nd</sup> 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.
<b>Mansfield Metropolitan Housing</b>	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 <sup>nd</sup> 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.
<b>Safe Program – Mansfield City Schools</b>	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 <sup>th</sup> 12 <sup>th</sup> 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 unsuitable 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>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>
<b>Catalyst Life Services</b>	Homeless service provider, working through the local Continuum of Care.	Interview	<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 guest 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>Get people connected to work.</p>
<b>Mansfield Police Department</b>	Public agencies that address the needs of all four of the qualifying populations.	Interview	<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-ARF Funding should be used for housing – lack of housing. Get people on the</p>

			<p>right track, they need somewhere to go. Group homes, assisted living, and standard housing.</p> <p>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.</p>
<b>North End Community Improvement Collaborative (NECIC)</b>	Homeless service provider, working through the local Continuum of Care.	Public Meeting and Interview, Public Hearing	<p>Need to continue to strengthen the food insecurity within the north end.</p> <p>Transportation is still a huge barrier. There are too many restrictions on funds that are provided.</p> <p>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.</p> <p>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.</p> <p>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.</p>
StrongerXChoice	Homeless service provider, working through the local Continuum of Care.	Interview	<p>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>

			<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 bunking 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>
<b>The Shelter</b>	Domestic violence and homeless service provider, working through the local Continuum of Care.	Public Meeting, Interview, 2 <sup>nd</sup> Interview with potential housing providers.	<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 assess 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>

			<p>Need support for operating and administrative costs, especially since we are expanding space. Could use more funding for rental assistance.</p> <p>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.</p>
<b>First Call 211</b>	<p>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.</p>	Public Meeting, Interview	<p>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.</p> <p>There is a new system called Unite Ohio, they need more funding.</p> <p>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.</p> <p>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?</p>

			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.
<b>COOHIO</b>	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.
<b>Harmony House</b>	Homeless service provider, working through the local Continuum of Care.	Interview, 2 <sup>nd</sup> 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 follow 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 2021  
AAP  
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 @ 6:45pm 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 Fl. 8 Mansfield, Ohio 44902 on or before November 30, 2022. Comments regarding this plan must be submitted in writing to [ackerman@ci.mansfield.oh.us](mailto:ackerman@ci.mansfield.oh.us) or via mail to 30 N. Diamond St Fl. 8 Mansfield, Ohio 44902. Comments must be received on or before December 15, 2022 @ 4:00 PM to be considered.  
(MNJDec1,'22#5503478)

Order Confirmation for Ad #: 005503478



**Customer:** CITY OF MANSFIELD - COMM DEV  
**Address:** 30 N DIAMOND ST  
 MANSFIELD OH 44902 USA  
**Acct. #:** MCO-M5516  
**Phone:** 4199507993  
**Email:**  
**Payor:** CITY OF MANSFIELD - COMM DEV  
**Ordered By:** Adrian Ackerman

Order Start Date: 12/01/2022		Order End Date: 12/01/2022		PO #:	
<b>Day Sheets:</b> 1	<b>Alt Dates:</b> 1	<b>Print Size:</b>	<b>Promo Type:</b>	<b>Materials:</b>	<b>Special Pricing:</b>
<b>Net Amount:</b> \$100.25	<b>Tax Amount:</b> \$0.00	<b>Total Amount:</b> \$100.25	<b>Payment Method:</b> Invoice	<b>Payment Amount:</b> \$0.00	<b>Amount Due:</b> \$100.25

Ad Order Notes:  
Sales Rep: JHunko

Order Taken: 12/01/2022

Product	# Ins.	Start Date	End Date	Placement	Position
MCO-Mun-Mansfield News Journal	1	12/01/2022	12/01/2022	MCO-Legals	Legal Notices
MCO-Mun-Mansfield Online	1	12/01/2022	12/01/2022	MCO-M-Legals	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 HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of beds	# of units	# of beds					# of beds	# of units	# of beds	# of units
Emergency Shelter <sup>1</sup>	40	12	40								
Transitional Housing											
Rapid Rehousing <sup>1</sup>	6	2	25								
Permanent Supportive Housing <sup>3</sup>	40	20	69								
Total emergency and transitional housing	40	12	40								
Total Long-term housing with supportive services <sup>1</sup>	46	22	94								
Total Numbers <sup>2,3</sup>				3	49	1 <sup>4</sup>	9 <sup>3</sup>				
Number in emergency shelter <sup>2</sup>				58							
Number in transitional housing <sup>2</sup>				0							
Number unsheltered <sup>2</sup>				9							
<b>Current Gap</b>											
Temporary housing, including emergency shelter, transitional housing, and rapid rehousing options								(7) <sup>5</sup>	(9)	9 <sup>5</sup>	8 <sup>5</sup>
Permanent supportive housing options <sup>6</sup>								7 <sup>5</sup>	3	49	41 <sup>5</sup>

<sup>1</sup> From Continuum of Care Housing Inventory Count (HIC) for 2021, the most recent available.

<sup>2</sup> 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.

<sup>3</sup> Number is based upon the 2010 Health Policy Institute of Ohio, profile of Family Violence in Richland County, each year there are 2,001 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 980-1,300 adults physically abused by a current or former intimate partner; 295 people filing petitions for civil protection orders, and 73 adults and 55 children seeking shelter in Richland County domestic violence shelters. Therefore, the need is likely greater than what is represented by the number of persons seeking shelter here.

<sup>4</sup> This is a double count of persons already counted in the other categories.

<sup>5</sup> Assumes 2.2 persons per household for families with children, and 1.2 persons per household for adults only households.

<sup>6</sup> These numbers assume that the 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 <sup>1</sup>	9,541		
Rental units affordable to Extremely Low Income (ELI) households <sup>1</sup>	3,884		
Additional Rental Units Affordable to Very Low Income Households (at or below 50% AMI) <sup>1</sup>	8,621		
Number of ELI households <sup>2</sup>		4,645	
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 <sup>3</sup>		3,670	
Number of Low Income Households (Between ELI limit and 50% AMI) <sup>2</sup>		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 <sup>3</sup>		6,062	
Number of affordable rental units to ELI households in the City above the number of ELI households that rent <sup>4</sup>			+214 (Surplus of homes, but see note <sup>4</sup> )
Number of affordable rental units to Low Income households in the City above the number of Low Income households that rent <sup>4</sup>			+2,559 (Surplus of homes, but see note <sup>4</sup> )

<sup>1</sup> 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.

<sup>2</sup> 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 rents 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.

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

<sup>4</sup> 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 <sup>1</sup>	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
	35, or 52%, identified as Male (67% of unsheltered)	17, or 25% identified as Black/African American (0% of unsheltered)	3, or 5%, 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 (11% of unsheltered)	3, or 4%, identified as Native American (33% of unsheltered)	39, or 58% identified as between the ages of 25 and 64 (56% of unsheltered)	9, or 13% were unsheltered
		1, or 1%, identified as more than one race	6, or 9% identified as over 65 years old (22% of 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.... <sup>2</sup>	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	

17

		1% identified as more than one race	20% identified as 35-44	
		For 1% race/ethnicity information was missing	16% identified as 45-54	
			17% 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.

<sup>1</sup> 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 exacerbated by Covid. 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, info, 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 350 and 400 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."

<sup>2</sup> Percentages and numbers are based upon Homeless Response Team data for May 2-31, 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 8.67 persons were encountered per visit. The focus here is on unsheltered homeless. In the program, behavioral health professionals from Catalyst 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
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	525	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	40	95	15	150
Total need by income	1,215	365	50	1,630	370	280	130	780

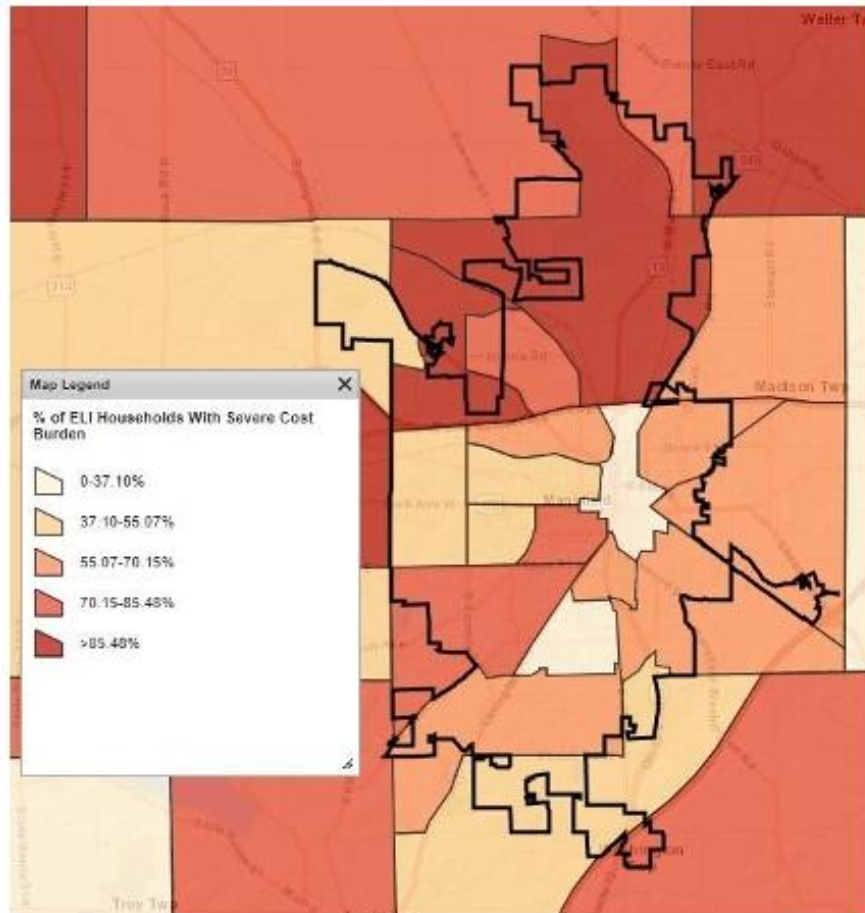
**Cost Burden > 50%**

Data: 2009-2013 CHAS  
Source:

**Table 6: Current 2022 Income Limits for Richland County**

FY 2022 Income Limit Area	Median Family Income <a href="#">Click for More Detail</a>	FY 2022 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Mansfield, OH MSA	\$70,700	Very Low (50%) Income Limits (\$)	25,950	29,650	33,350	<b>37,050</b>	40,050	43,000	45,950	48,650
		<a href="#">Click for More Detail</a>								
		Extremely Low Income Limits (\$)*	15,600	18,310	21,030	<b>27,750</b>	32,470	37,190	41,910	46,630
		<a href="#">Click for More Detail</a>								
		Low (80%) Income Limits (\$)	41,550	47,450	53,400	<b>59,300</b>	64,050	68,800	73,550	78,300
		<a href="#">Click for More Detail</a>								

**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%	12,195		
White	79.1%	10,040	82.3%	No*
Black / African American	22.6%	1,650	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

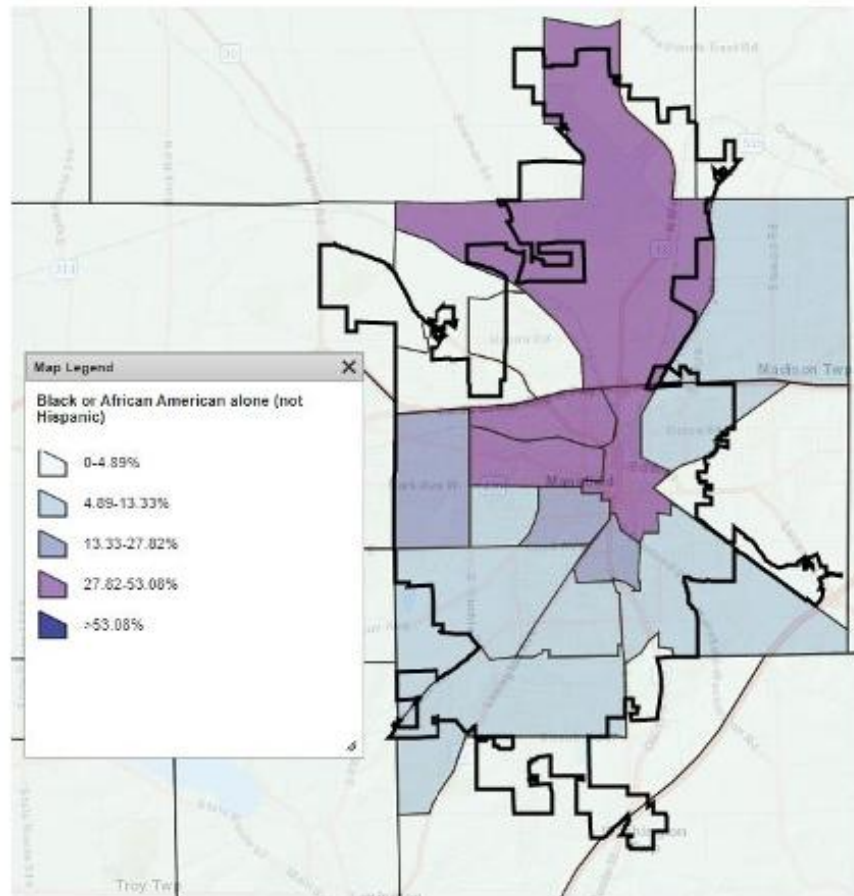
percentage of persons with severe housing problems be at least 10 percentage points higher than the percentage of persons in the racial/ethnic category as a whole. Therefore, this is not considered to be a statistically significant disproportionate impact.

**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
<b>Emergency Shelter</b>			
Harmony House	433	229	52.9%
<b>Rapid Rehousing</b>			
Harmony House	17	17	100%
Catholic Charities Diocese of Toledo	39	31	79.5%
<b>Total</b>			
	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 ... ?*



\* For example, each year in our county between 610 and 840 adult women experience physical intimate partner violence, in comparison, 646 adult women are injured in motor vehicle crashes.

#### 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".

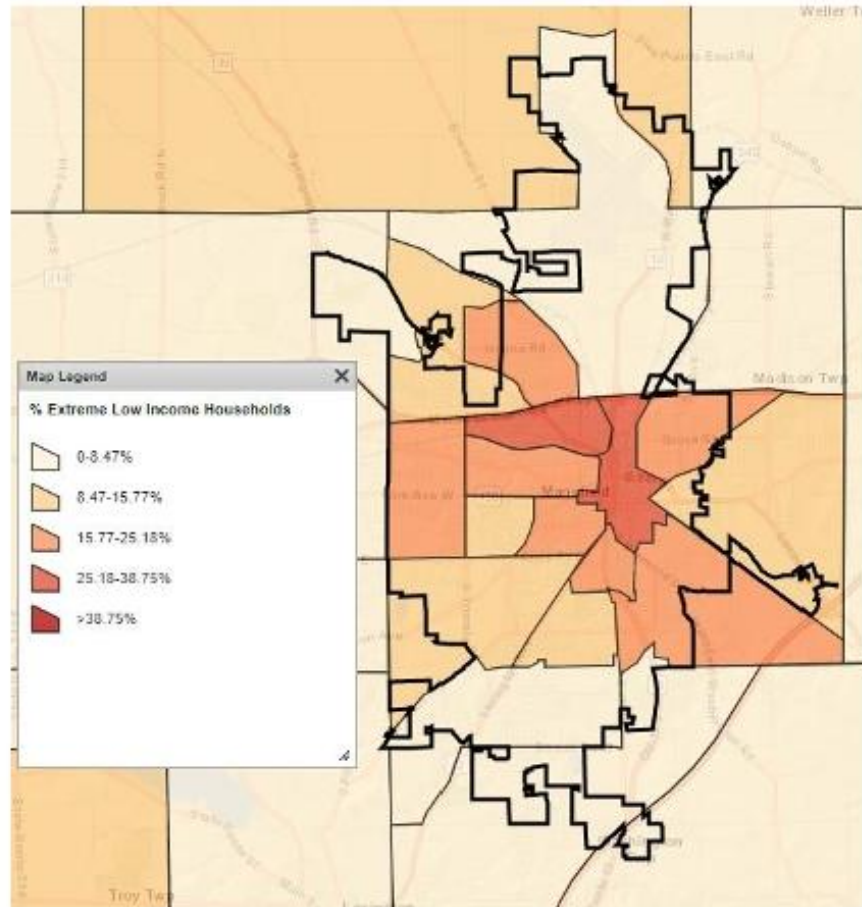
As identified in the City of Mansfield's current Consolidated Plan, there are 2,765 households in the City of Mansfield that are in the extremely low- income category. According to the HUD 2015 to 2019 Comprehensive Housing Affordability Strategy (CHAS) Data (the most recent available), 1,865 (67.5%) 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 13.8% 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.

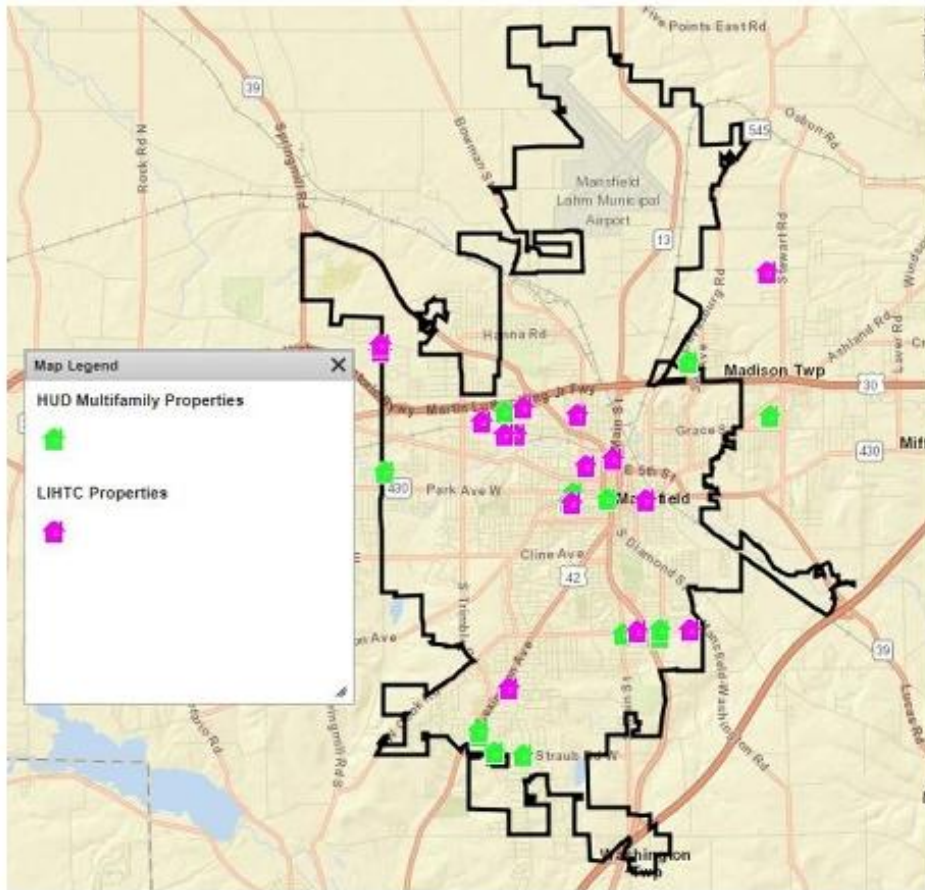
Several organizations provide services to these populations, and there are a variety of affordable and supportive housing resources. For further details on these organizations and the services that they provide, refer to the “Consultation” section of this Allocation Plan.

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.

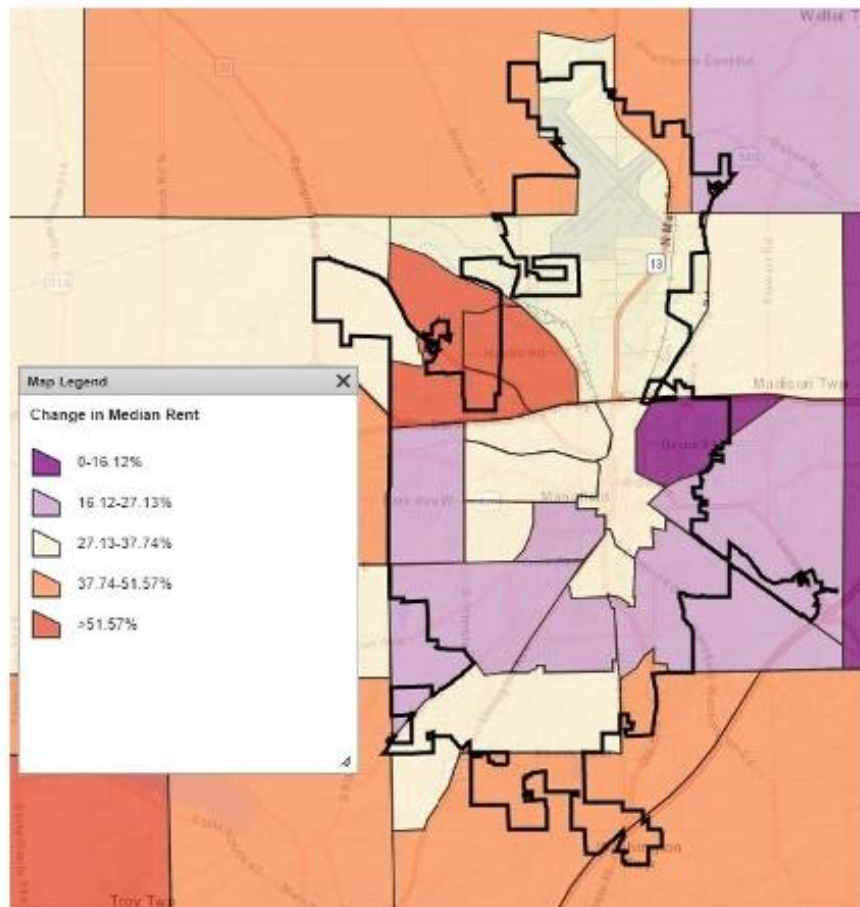
**Table 9: Average length of stay in shelters.**

Name of Facility	Average Length of Stay in Days	Median Length of Stay in Days
Harmony House (Emergency Shelter)	24.44	18
Catholic Charities Diocese of Toledo (Rapid Rehousing)	121.49	112
Harmony House (Rapid Rehousing)	59.54	53
Average across facilities	68.49	61

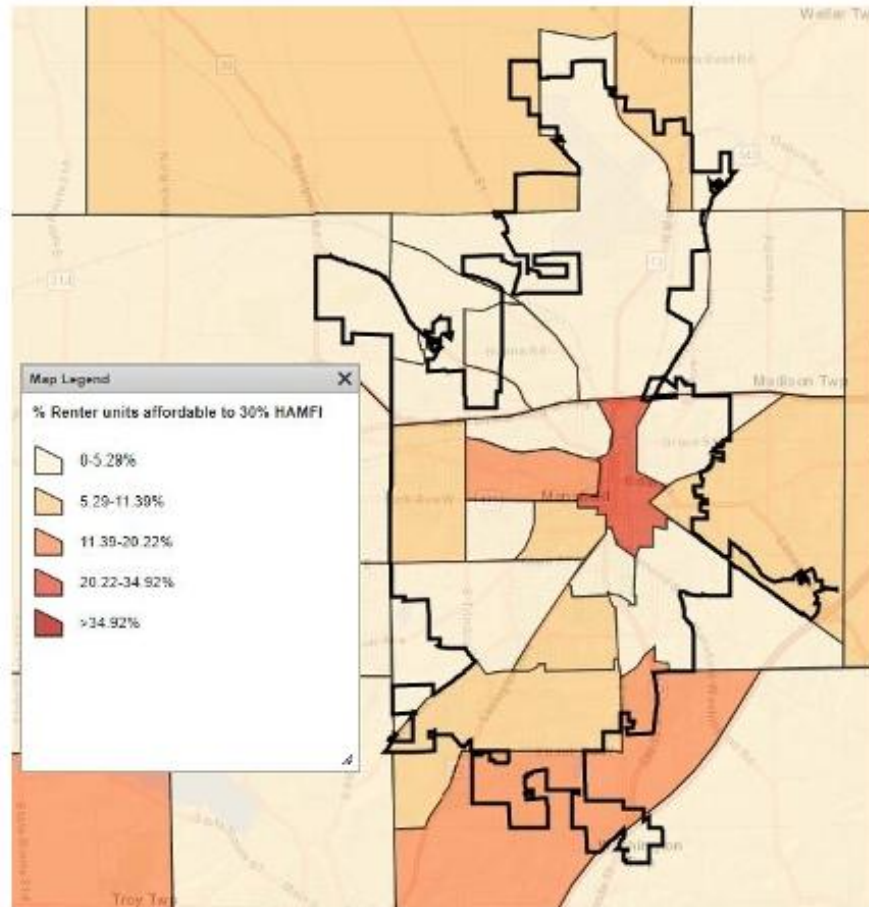
**Map 4: LIHTC and HUD Multi Family Properties within the City of Mansfield**



**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 (9 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 person's 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**

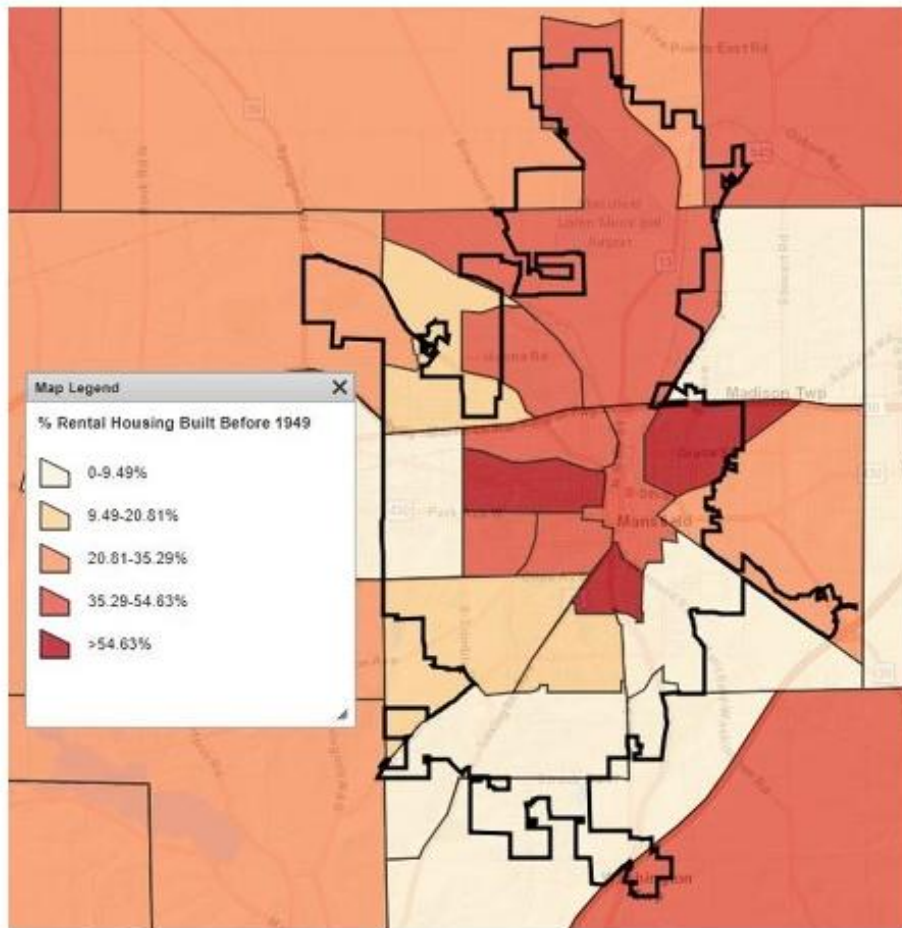
The needs of this group largely mirror the needs identified under "at risk of homelessness". As shown on Table 2, there is an identified gap of 3 supportive housing units (7 beds) for families, and 41 housing units (49 beds) for adults only. As described in the narrative under homelessness, moving some 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

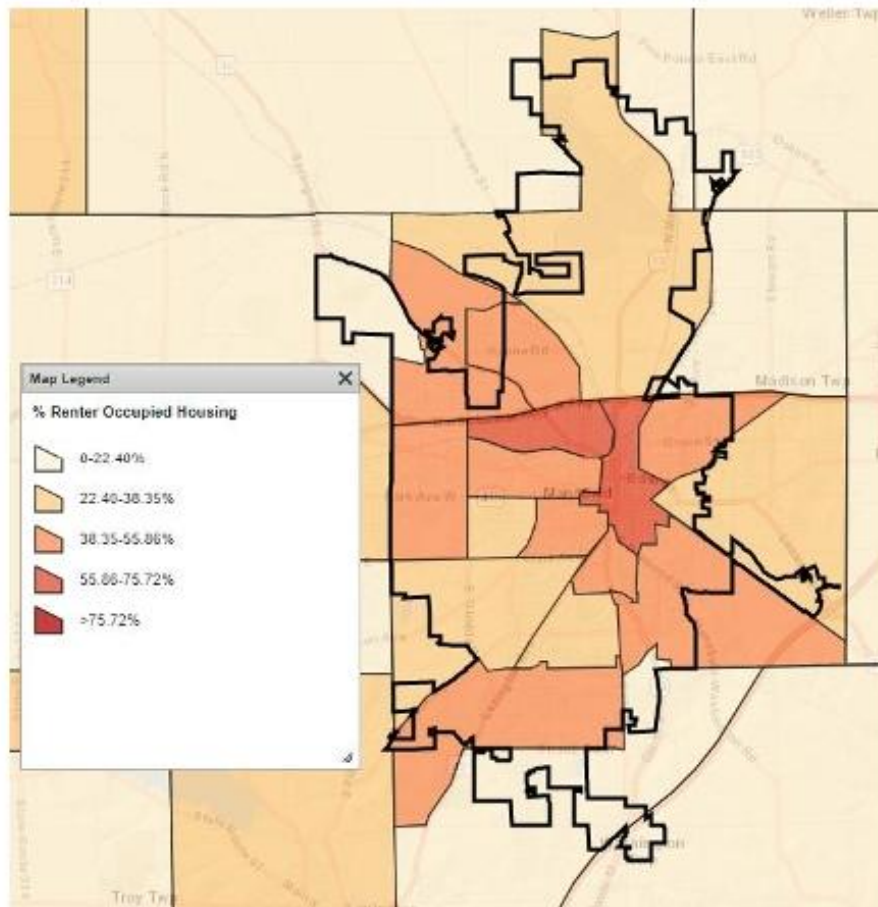
geographic part of the City. In addition, because much of the affordable housing stock is older (see map 7), the condition of the units also becomes an issue.

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 PJ'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 <sup>2</sup>
Development of Affordable Rental Housing	12 units of permanent supportive housing <sup>1</sup>  \$650,000	Creation of additional housing units affordable to ELI HH, tied to services needed by tenants. Units and services may, or may not, meet formal HUD definition of PSH, but will be matched 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 submission requirements, the scoring criteria, and other activity elements.	ELI 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"> <li>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.</li> <li>The other portion to be tied to the proposed City affordable housing project(s), 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.</li> </ul>	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.	ELI households, all QPs Preferences: \$75,000 for QP 1 and 3; \$75,000 tied to projects for all QPs (see note <sup>3</sup> )

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 <sup>2</sup>
Non-Profit Capacity Building	n/a \$52,665	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 populations, 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 ARP supportive service activities.	Organizations willing and able to provide staffing for HOME-ARP 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 Mansfield Administration	n/a \$159,293	Admin., planning, program/ project oversight, closeout, & monitoring.	City Staff	n/a	n/a
<b>Total:</b>	<b>\$1,061,958</b>				

<sup>1</sup> 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.

<sup>2</sup> 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 Requiring Services or Housing Assistance to Prevent Homelessness OR At Greatest Risk of Housing Instability

<sup>3</sup> 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 (QP1 and 3), and \$75,000 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	4.96 %	5%
Administration and Planning	\$ 159,293	14.99 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,061,958</b>		

**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 I.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 I.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. *PJ's 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 92.206\(b\)](#). 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