

Executive Summary

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

1. Introduction

The City of Dayton has prepared the Year 4 Action Plan as required under 24 CFR 91.220. As the fourth Annual Action Plan of the 2021-2025 Consolidated Plan, the Year 4 Action Plan identifies the activities to be funded with Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grants (ESG) program funds received during the program year. This document accounts for CDBG and ESG activities implemented in the City of Dayton and the housing-related developments supported through HOME funding throughout the community.

The Annual Action Plan corresponds to the January 1, 2024, through December 31, 2024, program year, and articulates the funding decisions of specific federal funds according to the long-term goals established in the 2021-2025 Consolidated Plan (CP). The CP was guided by three overarching goals that are applied according to community needs:

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;

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

Expanding **economic opportunities** through more jobs paying self-sufficient wages, homeownership opportunities, and development activities that promote long-term community viability and the empowerment of LMI persons to achieve self-sufficiency.

2024 Action Plan - Year 4

The City of Dayton is awarded \$5,479,181 in CDBG funding, \$501,678 in ESG funding, and \$1,121,655.41 in HOME funding during the 2024 Program Year. This is a decrease of approximately 4.00% for the City's CDBG program, a 0.20% increase for the ESG program, and a decrease of approximately 27.87% for the HOME program from the 2023 allocations. During this fourth year of the CP, the City is focused on progressing toward completion of the established goals and priorities established in the ConPlan.

Focus of the Plan

As required by the U.S. Department of Housing and Urban Development (HUD), the identification of needs and the adoption of strategies to address those needs must focus primarily on LMI individuals and households. The CP must also address the needs of persons with “special needs” such as the elderly, persons with disabilities, large families, single parents, homeless individuals and families, and public housing residents. The CP identifies housing, homeless, community development, and economic development needs and resources, while providing a strategic plan to address those needs in accordance with community priorities.

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.

In addition to the overarching 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 or blight; or
- Meeting a particular urgent community development need.

Dayton’s Consolidated Plan describes the priority community development needs eligible for assistance under the CDBG, HOME, and ESG 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, ESG, and HOME Programs, while meeting the National Objectives, all to be realized through the execution of the Consolidated Plan.

2024 Action Plan - Year 4 Goals & Objectives

Expand, Maintain, and Improve Affordable Housing

Provide assistance to both private and public owner- and renter-occupied units through the rehabilitation of 50 rental units, the construction of 10 owner-occupied units and 20 renter-occupied units, the rehabilitation of 210 owner-occupied units, and direct financial assistance to 20 homebuyers.

Demolition of Abandoned Structures

Continue addressing blight through demolition efforts and elimination of approximately 150 structures (200 units).

Neighborhood Safety Measures

Provide infrastructure improvements and public service programming to 20 people to increase neighborhood safety.

Infrastructure Improvements

Improvements to 5 residential neighborhoods for 30,000 individuals through activities that include street, curb, and sidewalk improvements and improvements to recreational spaces.

Expand Economic Dev. Opportunities

The City will assist 2 businesses with programs such as facade improvements and ADA modifications that will result in the creation or retention of 12 jobs.

Workforce Development

Support workforce development through job training, soft skill development, and certification programming for at least 50 individuals resulting in assistance for one business and the creation/retention of 10 jobs.

Public Services

Increase the availability and accessibility of public services throughout the City of Dayton via youth services, education, senior services, financial wellness, and addiction services programs for 100 individuals.

Address Homelessness and At-Risk Homelessness

Provide overnight shelter to 3,000 individuals, prevention services to 200 individuals, and supportive services for outreach to homeless individuals homelessness to 100 individuals.

Planning & Program Administration

Provide planning and administration assistance for implementation of the goals and objectives identified in the City's 2021-2025 Consolidated Plan.

3. Evaluation of past performance

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

The past performance of the City of Dayton in the administration and implementation of the CDBG, HOME, and ESG programs has fulfilled the requirements of the federal legislation that created these programs. Through years of effective planning, partnership, and monitoring, the programs have facilitated affordability for decent housing, availability and accessibility of a suitable living environment,

sustainability of a suitable living environment, and accessibility to economic opportunities in the greater-Dayton area. At the end of each program year, the City of Dayton prepares the Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER identifies funds expended and activities undertaken throughout the program year to meet the goals established within the Consolidated Plan. The City of Dayton strives to meet the goals established in the Consolidated Plan and ultimately improve the lives of residents.

Funding for the 2023 program year was not received until approximately 11 months after the start of the City's program year. This significantly delayed projects such as asphalt and alley resurfacing and home rehabilitation programs. During the third year of the 2021-2025 Consolidated Plan, the City made continued progress toward many of its ConPlan goals and objectives. When looking at GOIs and Goals that need additional support for the remainder of the Consolidated Plan, the following goals were identified as needed focus areas:

- Neighborhood Safety Measures
- Expanding Economic Development Opportunities
- Affordable Housing - rental unit construction and rehabilitation; homeowner housing rehabilitation

Throughout 2024, the City desires to complete additional programming aimed at advancing all of the ConPlan goals, and will work with local partners to determine eligible activities under the CDBG, HOME, and ESG programs that may help address goals with underserved GOIs. The City will continue to evaluate the performance of funded projects and activities, and will re-evaluate progress toward serving unmet needs throughout the remainder of the Consolidated Plan. Re-evaluating priorities and needs throughout the remainder of the Consolidated Plan will give city staff time to make amendments, provide guidance to encourage projects within underserved goals, and provide additional technical assistance toward subrecipients or projects identified as supporting those underserved indicators.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

The requirements of Dayton's Citizen Participation Plan were met during the draft review phase and after the 2024 annual allocations were announced.

The City of Dayton provided two opportunities for public participation and consultation for the 2024 Action Plan:

- The first opportunity occurred during the draft development phase, and a public notice was published in the Dayton Daily News announcing a 30-day comment period from Friday, October

18, 2023, through Friday, November 17, 2023. The public notice also included information about the public hearing and presentation on the draft Action Plan that occurred on November 13, 2023, during the regularly scheduled Community and Neighborhood Development Advisory Board (CNDAB) meeting.

- The second opportunity for public participation was held during the allocation finalization phase at the regularly scheduled Community and Neighborhood Development Advisory Board (CNDAB) meeting on June 10, 2024.

During the development and allocation update for the 2024 Action Plan, the CNDAB meetings occurred on the second Monday of every month at 4:30PM on the Mezzanine Floor in the Planning Resource Center, 101 West Third Street, Dayton, Ohio 45402. The meeting on November 13, 2023, was held in-person, and both the November 13, 2023, and June 10, 2024, meetings provided a virtual format through Teams, and public participants were able to request a link via email or utilize the provided Teams link to attend the meeting.

Information was also provided for the process of requesting draft copies of the Action Plan as well as submitting comments. Written comments could be submitted to Beth Wilson at beth.wilson@daytonohio.gov, and questions could be submitted by calling (937) 333-3688.

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 public comments were received during the public comment period, public hearing, or public meetings.

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

Not applicable - No comments were received during the public comment period, public hearing, or public meetings.

7. Summary

During the implementation of the 2024 Action Plan, the City of Dayton's HUD Entitlement funding will be utilized to address the following Priority Needs:

- Revitalization of Neighborhoods
- Quality of Affordable Housing
- Expansion of Economic Opportunities
- Provision and Coordination of Public Services
- Homelessness

The goals established by the City of Dayton to meet the Priority Needs include:

1. Expanding, Maintaining, and Improving Affordable Housing
2. Demolition of Abandoned Structures
3. Neighborhood Safety Measures
4. Infrastructure Improvements
5. Improving and Expanding Economic Development Opportunities
6. Workforce Development
7. Public Services
8. Addressing Homelessness and At-Risk Homelessness
9. Planning and Program Administration

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	DAYTON	Dept. of Planning, Neighborhoods, & Development	
HOME Administrator	DAYTON	Dept. of Planning, Neighborhoods, & Development	
ESG Administrator	DAYTON	Dept. of Planning, Neighborhoods, & Development	

Table 1 – Responsible Agencies

Narrative (optional)

The lead agency responsible for the development of the 2024 Action Plan and any Amendments is the City of Dayton's Department of Planning, Neighborhoods, and Development. The Department of Planning, Neighborhoods, and Development is responsible for the administration of Dayton’s CDBG, HOME, and ESG programs.

Consolidated Plan Public Contact Information

For questions or to request more information about the 2024 Action Plan, please contact:

Sarah Geist, Community Development Manager

- 101 W. Third Street - P.O. Box 22, Dayton, OH 45401-0022
- (937) 333-3814
- Sarah.Geist@daytonohio.gov

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

1. Introduction

The City of Dayton continues to consult with several local agencies in an effort to demonstrate a commitment to identifying priority needs as part of the consolidated planning process. Engaging the participation of public agencies and non-profits in a collaborative manner is evident not only in the completion of the annual action plan as a part of the consolidated planning process, but in the administration and implementation of the programs awarded Entitlement funding. This is particularly evident through the establishment of various boards and groups used to facilitate this collaboration and strengthen the connection between public agencies, non-profits, and the community they serve.

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(I))

To enhance the coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies, the City of Dayton Community Development team participates in several boards and collaborative groups. Provision and coordination of public services is a Priority Need within this Consolidated Plan. The City of Dayton will administer activities to encourage coordination with existing service providers for increasing youth and senior activities; expanding educational and tutoring programs; addressing the need for addiction services and marketing existing services; and working with Montgomery County in a concerted effort to develop a coordinated service delivery system.

The City of Dayton is a member of the Dayton – Montgomery County Continuum of Care, as well as the Homeless Solutions Policy Board. Through that work the City participates in the Collective Impact process where the goal is to have community partners working together to address identified community needs. This work breaks down silos and encourages collaboration between all agencies working with our most vulnerable populations. To increase coordination on the region's approach to addressing homelessness, the City of Dayton partnered with Montgomery County to participate in a collective competitive process for HOME-ARP funding to ensure that selected service and housing projects meet the regional needs of our homeless or at-risk of homelessness populations.

To further encourage collaboration and coordination, the City participates in roundtable discussions hosted by the Downtown Dayton Partnership. Through this group, agencies, housing providers, and social service providers are able to collaborate on innovative solutions to address the needs and systemic issues present among individuals experiencing homelessness in the Dayton area. These roundtables give local organizations the opportunity to express their concerns and provide constructive feedback on aspects of the current model where additional resources are needed. The open discussion

allows for creative partnerships and development of collaborative funding opportunities that directly address existing conditions in real time.

Additionally, the City of Dayton has established the Housing Policy Steering Committee, which is comprised of partners from public and private housing providers, private and public service agencies, and key stakeholders associated with housing in the region.

The City continues to see the growth of partnerships, collaboration, and nexus-building stemming from the long-term recovery efforts from the 2019 Memorial Day tornado outbreak and the local response to COVID-19. Local housing organizations are collaborating on transformative housing rehabilitation and construction projects. Social service providers are partnering to better leverage available funding toward the most needed services. Local agencies continue to collaborate with health care providers and health insurance companies to ensure beneficiaries from organizations are receiving wrap-around services whenever possible. This continued coordination has allowed local organizations to better target their funding sources and ensure that program participants are receiving assistance and support from the appropriate agencies. The City intends to continue its supportive role in ensuring organizations receiving City funds are providing necessary services that support impacted residents while also ensuring efforts coincide with the efforts and activities proposed and implemented across the region.

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.

To best meet the needs of homeless persons, chronically homeless persons and families, and persons at risk of becoming homeless, the City participates in a regional approach to addressing homelessness. In order to ensure that a cohesive, coordinated, and comprehensive approach is utilized, the Cities of Dayton and Kettering, along with Montgomery County, work in tandem to identify homeless needs, set priorities and goals, and develop a strategy to address the established needs.

The City of Dayton is a participating jurisdiction in the Dayton-Kettering-Montgomery County Continuum of Care (Continuum) and the associated Homeless Solutions Policy Board. The Homeless Solutions Policy Board (HSPB) is the primary agency that manages the funding and programs associated with the Emergency Housing Coalition and Continuum of Care. HSPB allocates the collective funding of its partner jurisdictions, establishes performance standards, and provides program evaluation for the local CoC and ESG programs. Both the HSPB and the Continuum are guided by the Homeless Solutions 10-Year Community Plan, the guiding document for programs to end chronic homelessness and reduce overall homelessness within Montgomery County.

Beginning in August 2022, the City of Dayton partnered with Montgomery County and the Continuum of Care to begin the planning process for each jurisdiction's allocation from the HOME-ARP Program. The HOME-ARP allocation plans were submitted in March 2023 and accepted by HUD. The allocation

planning process strengthened the coordination among the jurisdictions and local homelessness providers and created a consolidated, strategic approach to addressing how HOME-ARP could best support efforts to address the needs of homeless persons and individuals at risk of homelessness. In the summer of 2024, the competitive process for housing and service projects requesting HOME-ARP funding was released. Applications were received from a variety of organizations and are being scored for feasibility, applicability, and impact on qualifying populations. The scoring process will finish in August and project awards should occur in September 2024.

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 Dayton participates in the Dayton / Kettering / Montgomery County Continuum of Care and the Homeless Solutions Policy Board. The Homeless Solutions Policy Board is the primary agency managing the Emergency Housing Coalition and Continuum of Care, and it is through this Policy Board that the allocation of funding, performance standards, and program evaluation for the Dayton / Kettering / Montgomery County Continuum of Care programs, including the ESG Program, are implemented.

The Homeless Solutions Policy Board and the Continuum of Care are guided by the Homeless Solutions 10-Year Community Plan to end chronic homelessness and reduce overall homelessness within Montgomery County. Dayton also has a representative on the Program Performance & Evaluation Committee (formerly the Continuum of Care Committee), the committee responsible for ensuring that the Continuum of Care's programs are effective and comply with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act regulations.

Through this board and committee, the joint Continuum provides a competitive application through which eligible organizations may apply to receive funding from the Continuum of Care and ESG programs. This allows the Continuum to seek ingenuity in serving the homeless community while ensuring that programs meet the guidelines and requirements of their governing regulations. The Continuum finalized its award suggestions at the end of 2022, with awarded activities receiving ESG funding in January of 2023. Awarded projects run through 2024, and the next competitive process should begin in Q4, 2024.

Additionally, the Continuum and City of Dayton are exploring implementation of an additional competitive process for the PSH programs funding through Continuum of Care TRA dollars.

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

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Community and Neighborhood Development Advisory Board
	Agency/Group/Organization Type	Housing Planning organization Community Development
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Community Development
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Community and Neighborhood Development Advisory Board (CNDAB) and the City of Dayton Department of Planning, Neighborhoods, and Development meet regularly to discuss the administration and implementation of the HUD programs and to meet HUD's citizen participation requirements in an organized manner. The Board met on several occasions to discuss housing and community development needs, review the progress toward the identified goals and objectives during the first year of the Consolidated Plan, and to review the goals of the previous Consolidated Plan and achievements made to reach those goals. CNDAB provides a space and frequent source of open dialogue regarding the current housing and community development needs, as well as suggestions on how to address current needs through the HUD programs.
2	Agency/Group/Organization	City of Dayton Department of Planning, Neighborhoods, & Development
	Agency/Group/Organization Type	Housing Community Development Grantee Department

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homelessness Strategy Non-Homeless Special Needs Economic Development Anti-poverty Strategy Community Development</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Staff from the Department of Planning, Neighborhoods, and Development (PND) provided input on their desires for the priorities and goals associated with the Consolidated Plan. As the entity/department responsible for the implementation and assessment of HUD-funded projects, Community Development team members provide vital evaluation of the accomplishments, progress, and compliance standards of programs and projects implemented city-wide. Community Development staff discussed the 2024 Action Plan and the outcomes from the 2023 CAPER at a staff meeting as it relates to housing and community development needs, and to review the goals of the previous Consolidated Plan and achievements made to reach those goals. Discussion on program expenditures, the effectiveness of our Competitive Process for CDBG, and the desire to establish a HOME Competitive Process ensued. Staff commented on current needs and suggested solutions to address them. Additional support has been provided by PND staff in identifying transformative and catalytic activities that could be funded with CDBG and would help address the City's timeliness concern.</p>
<p>3 Agency/Group/Organization</p>	<p>Montgomery County Housing and Homeless Solutions</p>
<p>Agency/Group/Organization Type</p>	<p>Housing Services-homeless</p>

	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The funding determinations and programmatic oversight by the Homeless Solutions Policy Board were consulted during the evaluation of the 2024 Action Plan accomplishment data and the development of the 2024 Action Plan. This collaboration is an integral part of addressing the housing needs of individuals and families who are homeless or are at risk of becoming homeless throughout the city. The partnership with the Homeless Solutions Policy Board ensured the City's ESG funding is being leveraged with County and regional funds to support the areas of highest need for populations experiencing homelessness in Dayton. Through this partnership, the City intends to development the HOME-ARP allocation plan with a regional focus on supporting homeless and at-risk homeless populations. Additionally, the City continues to support the partnership with homeless providers at Montgomery County to ensure both ESG and CoC funding best supports the region's homeless populations.
4	Agency/Group/Organization	Dayton Metropolitan Housing Authority DBA Greater Dayton Premier Managment
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Greater Dayton Premier Management's current strategic plan and action plan were consulted to determine the outstanding needs and desires of Dayton residents living in public housing units. This provided information on the changing landscape of public housing units within the Dayton area, the continued need for affordable housing and public housing units, and the programs and services that GDPM provides to public housing residents. Through this information, the City was able to evaluate the correlation between GDPM's upcoming projects and the current priority needs and goals for the City's Consolidated Plan. An annual evaluation of this data ensures that the City's intended use of HUD funds is supporting the needs of individuals living in public housing. Through continued partnership with GDPM, the City was able to support the refreshment of PHA housing units through construction of new units to replace outdated housing stock coming offline.</p>
5	<p>Agency/Group/Organization</p>	<p>Sustainability Focus Group</p>
	<p>Agency/Group/Organization Type</p>	<p>Agency - Managing Flood Prone Areas Agency - Management of Public Land or Water Resources Agency - Emergency Management Planning organization Grantee Department</p>
	<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Market Analysis Economic Development Anti-poverty Strategy Lead-based Paint Strategy</p>

	<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>Sustainability consultation focused on the continued development of a joint, all-department effort to address resiliency throughout the City. As documented by the City's Strategy for a Sustainable Dayton and the work of the Sustainability Office and multiple other City departments, the City will continue to work toward resiliency planning and is dedicated to increasing resiliency through the management and protection of natural resources, adaptation to increased natural disasters, increased support for reusable sources of energy, and the continued management of pollutants. Sustainability efforts include interdepartmental collaboration on projects such as brownfield cleanup and redevelopment, installation of renewable energy features, and greater access to affordable energy solutions and resiliency programming for residents.</p>
6	<p>Agency/Group/Organization</p>	<p>City of Dayton - Housing Policy Steering Committee</p>
	<p>Agency/Group/Organization Type</p>	<p>Housing Services - Housing Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment Service-Fair Housing Business and Civic Leaders</p>

<p>What section of the Plan was addressed by Consultation?</p>	<p>Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs Market Analysis Economic Development Anti-poverty Strategy Housing Policy Prioritization</p>
<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City of Dayton Housing Policy Steering Committee is helping to identify, prioritize, implement, and oversee the Dayton Housing Policy. Planning efforts behind the policy began in 2019 through participation in a Bloomberg/Harvard study on housing in Dayton. A thorough analysis of current housing trends and conditions led to the development of a draft plan aimed at supporting, creating, and retaining quality affordable, mixed-income, and workforce housing for Dayton residents. At the end of 2023, The Policy Steering Committee met to review the plan and begin the prioritization of action items for supporting housing efforts. This work will continue for the coming years as City staff work to implement new activities, additional incentives, and supportive programming aimed at increasing the strength of Dayton's housing stock.</p>

7	Agency/Group/Organization	Broadband Focus Group
	Agency/Group/Organization Type	Services-Education Services-Employment Services - Broadband Internet Service Providers Services - Narrowing the Digital Divide Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Broadband Connectivity

<p>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</p>	<p>The City of Dayton's focus on broadband connectivity continues as it strives to create equitable broadband access for residents. The Dayton Recovery Plan, funded through the City's allocation of American Rescue Plan Act dollars, set aside \$2.1 million for infrastructure improvements and programs to increase digital access across the City. The City began a \$235,000 city-wide inventory of fiber infrastructure within city facilities and right-of-ways to identify areas where infrastructure improvements are critical to development. An additional \$300,000 under the Dayton Recovery Plan was awarded to NPower, a national non-profit, to install broadband and equipment within a facility aimed at providing technology and broadband-focused workforce development and training for underserved residents. The City has also received \$250,000 from the State of Ohio via Broadband Ohio to provide free high-speed internet access to residents throughout its recreational facilities. The City hopes to continue its development of broadband connectivity and is hopeful that continued collaboration with broadband providers will bring added opportunities for Dayton residents. Local broadband expansion efforts have also led to the University of Dayton being awarded a grant from the State of Ohio's Office of Workforce Transformation for expansion of 5G Broadband access in the 12-county West Node. The efforts to expand broadband access will continue in 2024 as capacity building and additional ARPA-funded projects begin.</p>
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Identify any Agency Types not consulted and provide rationale for not consulting

The City of Dayton consulted a variety of organizations, agencies, and partners while developing the programs and activities in the 2024 Action Plan.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Dayton/Kettering/Montgomery County Continuum of Care	The Strategic Plan goals support the goals established in the Homeless Solutions Community 10-Year Plan for Ending Chronic Homelessness and Reducing Overall Homelessness. The Housing and Homeless Solutions Manager was a key contributor in establishing goals for the Strategic Plan.
Dayton Forward	City of Dayton	The goals of the Strategic Plan support the Economic Development, Equity, Housing, Land Reutilization, Mobility, Strategic Vision, and Sustainability sections of the Dayton Forward Comprehensive Plan, which includes accommodating the housing and social service needs of the region's LMI and special needs populations.
Dayton Housing Policy	City of Dayton	The goals established in the Strategic Plan, specifically the goals of "expanding, maintaining, and improving housing; demolition of abandoned structures; neighborhood safety measures; public services; and addressing homelessness and at-risk homelessness" support the goals of the Dayton Housing Policy by focusing HUD-funded activities on the development, protection, and rehabilitation of housing in Dayton. Through services and programs funded with Entitlement grants, the City of Dayton further supports the Housing Policy by providing fair housing support, encouraging homeownership, assisting homeowners with repairs, and assisting vulnerable populations with housing issues to prevent additional homeless families.

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 requirements of Dayton’s Citizen Participation Plan were met during the draft review phase and after the 2024 annual allocations were announced.

The City of Dayton provided two opportunities for public participation and consultation for the 2024 Action Plan:

- The first opportunity occurred during the draft development phase, and a public notice was published in the Dayton Daily News announcing a 30-day comment period from Friday, October 18, 2023, through Friday, November 17, 2023. The public notice also included information about the public hearing and presentation on the draft Action Plan that occurred on November 13, 2023, during the regularly scheduled Community and Neighborhood Development Advisory Board (CNDAB) meeting.
- The second opportunity for public participation was held during the allocation finalization phase at the regularly scheduled Community and Neighborhood Development Advisory Board (CNDAB) meeting on June 10, 2024.

During the development and allocation update for the 2024 Action Plan, the CNDAB meetings occurred on the second Monday of every month at 4:30PM on the Mezzanine Floor in the Planning Resource Center, 101 West Third Street, Dayton, Ohio 45402. The meeting on November 13, 2023, was held in-person, and both the November 13, 2023, and June 10, 2024, meetings provided a virtual format through Teams, and public participants were able to request a link via email or utilize the provided Teams link to attend the meeting.

Information was also provided for the process of requesting draft copies of the Action Plan as well as submitting comments. Written comments could be submitted to Beth Wilson at beth.wilson@daytonohio.gov, and questions could be submitted by calling (937) 333-3688.

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)
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1	Public Hearing	Non-targeted/broad community	<p>The public hearing was held during the draft development phase of the 2024 Action Plan process on November 13, 2024. During the hearing, the projected HUD Entitlement allocations were presented. Attendees were made aware that a reduction in allocations or the addition of funding would be addressed by making adjustments to the Competitive Processes for CDBG and HOME, and well as adjustments to utilize permitted admin percentages. An increase to the ESG allocation would adjust the 60% emergency shelter</p>	<p>No comments were received during the public hearing on November 13, 2023.</p>	<p>Not applicable no comments were received during the drafting and allocation finalization for the 2024 Action Plan.</p>	
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			<p>and 40% prevention, diversion, and rapid re-housing allocations to maintain the City's standard split of ESG funding. The public hearing was held at a Community and Neighborhood Development Advisory Board (CNDAB) meeting in the Mezzanine Floor in the Planning Resource Center, 101 West Third Street, Dayton, Ohio 45402. The meeting and public hearing was also held in a virtual format through Teams, and public participants were able to request a link via email or utilize the provided Teams link to attend the meeting.</p>			
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2	Public Meeting	Non-targeted/broad community	<p>After HUD released Entitlement allocations, the City provided the final 2024 Entitlement allocations during a regularly scheduled CNDAB meeting on June 10, 2024. City staff explained the decreases in funding for the CDBG and HOME Programs and detailed the decreases to activities under both programs by highlighting the decreased project delivery costs, admin, and competitive neighborhood improvement projects in the CDBG Program, and highlighting the decreases to admin and available funding for future HOME</p>	<p>No comments were received during the public meeting on June 10, 2024.</p>	<p>Not applicable - no comments were received during the drafting and allocation finalization for the 2024 Action Plan.</p>	
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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)
			<p>projects. City staff also explained that the small increase to ESG funding would increase the "60/40" percentage split of available funding. The meeting was held in a virtual format through Teams, and public participants were able to request a link via email or utilize the provided Teams link to attend the meeting.</p>			

3	Newspaper Ad	Non-targeted/broad community	<p>A Public Hearing and Comment Period Notice for the City's 2024 Action Plan was published in the Dayton Daily News on October 27, 2023. This notice provided information on the November 13, 2023 public hearing and presentation for the Action Plan Projection, including the date, time, location, process for requesting a virtual meeting invitation (if needed), the means of submitting public comments, and the contact information for requesting any materials. The notice also provided the time period for the open Public Comment Period.</p>	No comments were received from the public notice or during the public comment period.	Not applicable - no comments were received during the drafting and allocation finalization for the 2024 Action Plan.	
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Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The three primary resources available for implementation of the fourth year of the 2021-2025 Consolidated Plan come from HUD’s CDBG, HOME, and ESG Programs. Of the three allocations the City of Dayton receives, CDBG is the largest and most flexible source. In 2024, the City of Dayton will receive \$5,479,181 in CDBG funding, \$1,121,655.41 in HOME funding, and \$501,678 in ESG funding.

Additionally, the City of Dayton generates program income through its CDBG and HOME programs. The City is anticipating \$25,000 in program income from the CDBG Small Business Resource Assistance Program and \$400,000 in program income from repayment of a loan on an older project in the HOME Program.

To determine eligibility and allocations for federal entitlement funds, the population and poverty rates of a jurisdiction are the primary criteria evaluated. In recent decades, the City of Dayton has experienced significant population loss and a slight reduction to its poverty rate, resulting in substantial reductions in federal funding. The loss of federal funding led to re-alignment of City resources at the expense of programs aimed at maintaining a suitable living environment; affected programs include demolition of blight, road resurfacing and street improvements, improvements to recreation sites, and programs for residents. In 2024, the City saw the continued impacts of lost federal funding through a decrease of 4% to its CDBG funding and a substantial decrease of 27.87% to its HOME funding. The City's ESG allocation increased slightly by 0.20%. Based on information provided at the NCDAs Summer Conference and agreed upon federal budget terms, the City is bracing for a substantial decrease for the CDBG Program and a slight decrease to the HOME program during the remainder of the 2021-2025 Consolidated Plan. While cuts to domestic spending were part of the negotiations to pass federal budgets, the City hopes this trend will reverse in coming

years so that communities can continue to provide vital services, improvements, and programs to their most vulnerable populations.

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	5,479,181	25,000	0	5,504,181	9,958,362	The City of Dayton is anticipating receipt of approximately \$25,000 in CDBG Program Income. Additionally, the City is projecting a \$1million cut to its CDBG allocation for the final year of the Consolidated Plan due to the dramatic decrease in the federal allocation.

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	1,121,655	400,000	0	1,521,655	2,643,310	The City of Dayton is anticipating steady funding for the final year of the Consolidated Plan. In 2024, the City received repayment of a HOME loan in the amount of \$400,000.

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: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	501,678	0	0	501,678	1,003,356	The City of Dayton is anticipating a steady ESG allocation for the remainder of the Consolidated Plan.
Continuum of Care	public - federal	Rapid re-housing (rental assistance) Rental Assistance	2,698,292	0	0	2,698,292	0	The City of Dayton was awarded a 2023 CoC PSH TRA grant totaling \$2,698,292.00. The City is working with its subrecipient to amend the grant over this year.

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: \$		
Tax Credits	public - state	Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership	30,100,000	0	0	30,100,000	0	The City of Dayton's HOME projects have capital stacks that leverage over \$30 million in LIHTC sources.
Other	private	Acquisition Admin and Planning Economic Development Financial Assistance Housing Public Improvements Public Services Services	516,867	0	0	516,867	0	Leveraged private funds to support Dayton's CDBG projects.

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: \$		
Other	private	Acquisition Homebuyer assistance Homeowner rehab Housing Multifamily rental new construction Multifamily rental rehab New construction for ownership	22,100,000	0	0	22,100,000	0	Private funding sources from mortgages, developer support, private philanthropy, and other sources within the City of Dayton's HOME projects.
Other	private	Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services	501,678	0	0	501,678	0	Support from ESG subrecipients toward ESG-funded projects.

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: \$		
Other	public - federal	Acquisition Admin and Planning Homebuyer assistance Homeowner rehab Public Improvements Public Services Other	184,695	0	0	184,695	0	Funding support from other federal sources such as ARPA for Dayton's CDBG projects.
Other	public - federal	Acquisition Housing Multifamily rental new construction Multifamily rental rehab	3,490,000	0	0	3,490,000	0	Funding support from federal sources such as earmarks, HTF funds, and ARPA within the City of Dayton's HOME projects.
Other	public - federal	Acquisition Multifamily rental new construction Multifamily rental rehab	200,000	0	0	200,000	0	Support from Montgomery County's HOME Program for one of the City of Dayton's HOME projects.

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: \$		
Other	public - state	Economic Development Housing Public Improvements Public Services	450,000	0	0	450,000	0	Funding sources from the State of Ohio to support Dayton's CDBG projects.
Other	public - state	Homeowner rehab Housing Multifamily rental rehab	1,930,461	0	0	1,930,461	0	The City of Dayton's HOME projects have capital stacks that leverage over \$1.9 million in Ohio Historic Tax Credit sources.
Other	public - local	Admin and Planning Economic Development Housing Public Improvements Public Services Services	3,300,000	0	0	3,300,000	0	City of Dayton funding from its general fund to support demolition, public improvements, road resurfacing, and park facilities.
Other	public - local	Housing Public Services	294,814	0	0	294,814	0	Financial support from Montgomery County for the City of Dayton's CDBG program.

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 of Dayton and its partners appreciate the value and collective impact of leveraged funds on projects supported with Entitlement Grant funding.

In recent years, the City of Dayton's HOME match requirement has been reduced by 100% due to the City's satisfaction of both distress criteria. Regardless, the City's currently available HOME funds are leveraged at a rate of 3:100 through project support from tax credits, private investment, County HOME funds, Congressional Earmarks, HTF funds, and City funding from the American Rescue Plan Act. For years when a HOME match is required, the typical sources include forbearance of taxes and discounted land/property sales.

On an annual basis, the City of Dayton ensures that the matching requirement for the ESG Program is met. ESG subrecipients are required to submit total budgets that include all funding sources within the project, and the sources are confirmed during the annual subrecipient monitoring. Funding sources for the ESG match include: Montgomery County Human Services Levy; Montgomery County marriage license fees; United Way grants; Federal Emergency Management Agency (FEMA) funding; funding and support from the Montgomery County Children Services Division; funding and support from the Ohio Department of Development and Education; funding and support from the Veterans Administration; and private funding sources.

Other leverage sources include Continuum of Care (CoC) grants, LIHTC-funded projects, the Supportive Housing Program, and the Single Room Occupancy Program. Additionally, the City leverages CDBG and HOME funds as matches when applying for and securing grant sources and private funding.

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 Dayton will continue to pursue opportunities to utilize publicly owned land to capitalize on projects throughout the city. This methodology previously assisted the development of affordable housing and the rebuilding of multiple Dayton Public Schools buildings.

Currently, new housing is being constructed on land that was publically owned. In partnership with Greater Dayton Premier Management (GDPM), the City of Dayton provided land at the former Daymont Behavioral Health site for the construction of 50 new rental units known as Germantown Crossing. This new building is under construction and is anticipated to be open in 2025.

Additionally, the City will continue to partner with the Montgomery County Land Bank to aggregate land for development. Through their programming, the Land Bank is able to assist with the demolition of abandoned and blighted structures and ensure properties are able to move back into productive use.

Discussion

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Expand, Maintain, and Improve Affordable Housing	2021	2025	Affordable Housing Public Housing Homeless	Community-wide	Revitalization of Neighborhoods Quality of Affordable Housing	CDBG: \$150,000 HOME: \$1,409,490 Tax Credits: \$30,100,000 HOME - County Sources: \$200,000 HOME - Other Federal Sources: \$3,490,000 HOME Private Support: \$22,100,000 State Historic Tax Credits: \$1,930,461	Rental units constructed: 20 Household Housing Unit Rental units rehabilitated: 50 Household Housing Unit Homeowner Housing Added: 10 Household Housing Unit Homeowner Housing Rehabilitated: 210 Household Housing Unit Direct Financial Assistance to Homebuyers: 20 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Demolition of Abandoned Structures	2021	2025	Non-Housing Community Development	Community-wide	Revitalization of Neighborhoods	CDBG: \$850,000 City of Dayton General Fund: \$1,000,000	Buildings Demolished: 150 Buildings Other: 200 Other
4	Infrastructure Improvements	2021	2025	Non-Housing Community Development	Community-wide	Revitalization of Neighborhoods	CDBG: \$3,125,000 CDBG Private Support: \$150,000 City of Dayton General Fund: \$2,300,000 State Funding for CDBG Projects: \$300,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 30000 Persons Assisted Other: 5 Other
5	Expanding Economic Development Opportunities	2021	2025	Non-Housing Community Development	Community-wide	Revitalization of Neighborhoods Expansion of Economic Opportunities	CDBG: \$25,000	Jobs created/retained: 12 Jobs Businesses assisted: 2 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Workforce Development	2021	2025	Non-Homeless Special Needs Non-Housing Community Development	Community-wide	Expansion of Economic Opportunities Provision and Coordination of Public Services	CDBG: \$75,000 CDBG - County Support: \$294,814 CDBG - Other Federal Sources: \$75,000 CDBG Private Support: \$361,867	Public service activities other than Low/Moderate Income Housing Benefit: 50 Persons Assisted Jobs created/retained: 10 Jobs Businesses assisted: 1 Businesses Assisted
7	Public Services	2021	2025	Non-Homeless Special Needs Non-Housing Community Development	Community-wide	Expansion of Economic Opportunities Provision and Coordination of Public Services Homelessness	CDBG: \$106,196 CDBG - Other Federal Sources: \$109,695 CDBG Private Support: \$5,000 State Funding for CDBG Projects: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Addressing Homelessness and At-Risk Homelessness	2021	2025	Homeless	Community-wide	Homelessness	CDBG: \$90,000 ESG: \$501,678 Continuum of Care: \$2,698,292 ESG Private Support: \$501,678	Homeless Person Overnight Shelter: 3000 Persons Assisted Homelessness Prevention: 200 Persons Assisted Other: 100 Other
9	Planning and Program Administration	2021	2025	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Community-wide	Revitalization of Neighborhoods Quality of Affordable Housing Expansion of Economic Opportunities Provision and Coordination of Public Services Homelessness	CDBG: \$1,082,985 HOME: \$112,165	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Expand, Maintain, and Improve Affordable Housing
	Goal Description	<p>This goal is focused on maintaining, expanding, and improving the affordable housing stock in the City of Dayton. Units may be public or private owner- or renter-occupied structures.</p> <p>Activities that may address the affordable housing goal include, but are not limited to:</p> <ul style="list-style-type: none"> • rehabilitation programs • down payment assistance • repair programs • ADA rehabilitation or accessibility improvements • construction or rehabilitation of affordable and market-rate housing units • programs aimed at helping seniors age in place
2	Goal Name	Demolition of Abandoned Structures
	Goal Description	<p>The City of Dayton will continue to address blight in City neighborhoods through demolition of abandoned structures.</p> <p>Other GOI: The number of housing units included within the demolished structures/buildings.</p>
4	Goal Name	Infrastructure Improvements
	Goal Description	<p>The City of Dayton will provide infrastructure improvements throughout LMI-eligible areas within the City of Dayton.</p> <p>Activities that will meet the Infrastructure Improvements goal may include, but are not limited to:</p> <ul style="list-style-type: none"> • Residential street, curb, and sidewalk improvements • ADA improvements to public spaces, streets, curbs • Recreational and park improvements <p><u>Other GOI:</u> Neighborhoods where improvements occurred</p>

5	Goal Name	Expanding Economic Development Opportunities
	Goal Description	<p>The City of Dayton will continue to support activities aimed at increasing economic opportunities for local businesses and residents.</p> <p>Activities that will address Expanding Economic Development Opportunities may include, but are not limited to:</p> <ul style="list-style-type: none"> • Small business loan programs • Facade improvements and ADA modifications • Creation and rehabilitation to establish move-in ready spaces • Physical improvements to the built environment within neighborhood business districts
6	Goal Name	Workforce Development
	Goal Description	<p>The City of Dayton will continue to support activities aimed at increasing economic opportunities for local businesses and residents through support for existing and creation of new workforce training and development programming.</p> <p>Activities that address the Workforce Development goal include, but are not limited to:</p> <ul style="list-style-type: none"> • Workforce training and development initiatives • Job training • Apprenticeship programs • Skill Certifications • "Soft skill" development programs

7	Goal Name	Public Services
	Goal Description	<p>The City of Dayton plans to provide funding to increase accessibility and availability of public services throughout the community, particularly for non-workforce development activities. Public services that address workforce development are included in the Workforce Development goal.</p> <p>Activities that address Public Services may include, but are not limited to:</p> <ul style="list-style-type: none"> • Youth services • Education and tutoring services • After school and summer school services and programs • Senior services • Health and outreach services for elderly individuals and individuals with disabilities • Financial wellness services • Homeownership preparation and programming • Addiction services

8	Goal Name	Addressing Homelessness and At-Risk Homelessness
	Goal Description	<p>The City of Dayton will work in partnership with the Dayton-Kettering-Montgomery County Continuum of Care (CoC) to address homelessness and at-risk homelessness through its Emergency Solutions Grant (ESG) funding.</p> <p>Activities that fulfill the goal of Addressing Homelessness and At-Risk Homelessness include, but are not limited to:</p> <ul style="list-style-type: none"> • Assistance to homeless individuals and families with emergency shelter beds • Assistance to persons and households at risk of becoming homeless • Homelessness outreach services • Supportive services to homeless and at-risk populations transitioning from homelessness to self-sufficiency • Housing retention through prevention and diversion programming <p><u>GOI Other:</u> Persons provided assistance through outreach services</p>
9	Goal Name	Planning and Program Administration
	Goal Description	<p>The City of Dayton will fund planning, administration, and compliance costs associated with the implementation of the Consolidated Plan programs.</p> <p><u>GOI Other:</u> Organizations funded through Planning and Program Administration (City of Dayton staff and administrative costs)</p>

Projects

AP-35 Projects – 91.220(d)

Introduction

While allocated resources remain scarce, the City of Dayton has selected projects that reflect priority needs determined through the Consolidated Plan process and best benefit the City's LMI individuals and households.

A majority of the City's CDBG funding is directed toward the Infrastructure Improvement project for street resurfacing, alley resurfacing, and park improvements, as well as the Neighborhood Stabilization and Improvement Program, which includes housing rehabilitation activities and the City's Nuisance Abatement Program. Additional activities included in other projects are economic development activities, workforce training programs, public service activities, homelessness prevention and rapid re-housing, and affordable housing projects.

Projects

#	Project Name
1	Neighborhood Stabilization and Improvement Program
2	Economic Development Program
3	Public and Social Service Support Program
4	Infrastructure and Neighborhood Conservation Program
5	Community Planning
6	Grant Program Administration and Compliance
7	ESG Program
8	CHDO Set-Aside
9	HOME Competitive Process

Table 7 - Project Information

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

The City of Dayton is committed to allocating funds to programs that serve the needs of the lowest-income and most disadvantaged residents. Households with incomes less than 80% of the area median income (AMI), particularly those with extremely low incomes of less than 30% AMI, receive a high priority in funding allocation determinations. Special needs populations, including at-risk youth, low-income families, homeless persons and persons threatened with homelessness, the elderly, and persons with disabilities, also receive high priority in the expenditure of federal entitlement funds. The needs of

low- and moderate-income (LMI) households and special needs populations will be addressed through three funding categories:

- The provision and maintenance of affordable housing;
- Investment in community development activities in lower-income and deteriorating neighborhoods, and in facilities that serve lower-income populations; and
- Supportive services to maintain independence.

By focusing on these three categories, Dayton will build upon existing assets and partnerships to address a variety of community needs, such as:

- Suitable affordable housing to address the growing gap between housing costs and household income, thereby reducing housing cost burden and overcrowding;
- Community services and facilities improvements, particularly in LMI areas;
- Strong network of shelter, housing, and support services to prevent homelessness, move the homeless to permanent housing and independence, and eliminate chronic homelessness.
- Economic development initiatives to promote investment, job creation, and job training;
- Supportive services that increase the ability of special needs populations to live independently.

AP-38 Project Summary
Project Summary Information

1	Project Name	Neighborhood Stabilization and Improvement Program
	Target Area	Community-wide
	Goals Supported	Expand, Maintain, and Improve Affordable Housing Demolition of Abandoned Structures
	Needs Addressed	Revitalization of Neighborhoods Quality of Affordable Housing
	Funding	CDBG: \$1,000,000 City of Dayton General Fund: \$1,000,000
	Description	Under the Neighborhood Stabilization and Improvement Program, a variety of activities are carried out by the City of Dayton and its subrecipient partners: homeowner rehabilitation, emergency housing repair, demolition and nuisance abatement, and housing rehabilitation project delivery, among others.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> • 210 families through rehabilitation of homeowner housing units • 20 families through direct financial assistance to homebuyers
	Location Description	Activities funded under the Neighborhood Stabilization and Improvement Program project will be carried out community-wide.
	Planned Activities	Planned activities under the Neighborhood Stabilization and Improvement Program include: <ul style="list-style-type: none"> • Neighborhood Safety Measures • Homeowner Rehabilitation and Urgent Repair Activities • Nuisance Abatement & Demolition GOI Other: 200 - Units demolished
2	Project Name	Economic Development Program
	Target Area	Community-wide
	Goals Supported	Expanding Economic Development Opportunities Workforce Development Public Services

	Needs Addressed	Revitalization of Neighborhoods Expansion of Economic Opportunities Provision and Coordination of Public Services
	Funding	CDBG: \$100,000 CDBG - County Support: \$294,814 CDBG - Other Federal Sources: \$75,000 CDBG Private Support: \$361,867
	Description	The Economic Development Program helps address the Consolidated Plan goals through the Small Business Resource Assistance Program, otherwise known as Neighborhood Business Assistance Microloan Program. Additional activities, such as job training programs, will address workforce development goals.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> • 50 individuals will benefit from public service activities • 12 individuals will benefit from the creation/retention of jobs • 3 businesses will benefit from economic development support
	Location Description	Activities under the Economic Development Program project will be carried out community-wide.
	Planned Activities	The Economic Development Program includes the Small Business Resource Assistance Program, otherwise known as the Neighborhood Business Assistance Microloan Program. Additional activities include workforce development programs aimed at increasing urban gardening skills and providing job and soft skill training to homeless youth.
3	Project Name	Public and Social Service Support Program
	Target Area	Community-wide
	Goals Supported	Public Services Addressing Homelessness and At-Risk Homelessness
	Needs Addressed	Provision and Coordination of Public Services Homelessness
	Funding	CDBG: \$196,196 CDBG - Other Federal Sources: \$109,695 CDBG Private Support: \$5,000 State Funding for CDBG Projects: \$150,000

	Description	The Public and Social Service Support Program benefits the community through partnerships with education, homelessness, and housing providers that benefit social needs populations in the community.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> • 100 individuals will receive support through public service programs
	Location Description	Activities under the Public and Social Service Support Program project will be carried out community-wide.
	Planned Activities	<p>Public and Social Service Support Program activities include:</p> <ul style="list-style-type: none"> • Afterschool programming • Educational services • Homeless outreach services • Senior services
4	Project Name	Infrastructure and Neighborhood Conservation Program
	Target Area	Community-wide
	Goals Supported	Infrastructure Improvements
	Needs Addressed	Revitalization of Neighborhoods
	Funding	CDBG: \$3,125,000 CDBG Private Support: \$150,000 City of Dayton General Fund: \$2,300,000 State Funding for CDBG Projects: \$300,000
	Description	The Infrastructure and Neighborhood Conservation Program improves CDBG-eligible residential neighborhoods through infrastructure improvements, including residential street and alley resurfacing and recreational space capital improvement projects.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> • 30,020 individuals will benefit from infrastructure improvements • 20 individuals will benefit from services • 5 neighborhoods will see improvements to public facilities and infrastructure

	Location Description	Activities under the Infrastructure and Neighborhood Conservation Program project will be carried out community-wide.
	Planned Activities	Planned Infrastructure and Neighborhood Conservation Program activities include: <ul style="list-style-type: none"> • Residential Asphalt Resurfacing • Alley Resurfacing • Neighborhood Improvement Projects • Recreational improvement projects GOI Other: Neighborhoods where improvements occur
5	Project Name	Community Planning
	Target Area	Community-wide
	Goals Supported	Planning and Program Administration
	Needs Addressed	Revitalization of Neighborhoods Quality of Affordable Housing Expansion of Economic Opportunities Provision and Coordination of Public Services Homelessness
	Funding	CDBG: \$241,500
	Description	The Community Planning project supports general planning, zoning appeals, landmarks, and historic preservation functions.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Activities under the Community Planning project will be carried out community-wide.
	Planned Activities	Community Planning activities include the provision of planning services throughout the City of Dayton.
6	Project Name	Grant Program Administration and Compliance
	Target Area	Community-wide

	Goals Supported	Planning and Program Administration
	Needs Addressed	Revitalization of Neighborhoods Quality of Affordable Housing Expansion of Economic Opportunities Provision and Coordination of Public Services Homelessness
	Funding	CDBG: \$841,485 HOME: \$112,165
	Description	The Grant Program Administration and Compliance project supports administration of federal entitlement grants.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Activities under the Grant Program Administration and Compliance project will be carried out community-wide.
	Planned Activities	Grant Program Administration and Compliance activities include: <ul style="list-style-type: none"> • Division of Community Development - Grants Administration • Indirect Costs • HOME City Administrative Support
7	Project Name	ESG Program
	Target Area	Community-wide
	Goals Supported	Addressing Homelessness and At-Risk Homelessness
	Needs Addressed	Homelessness
	Funding	ESG: \$501,678 Continuum of Care: \$2,698,292 ESG Private Support: \$501,678
	Description	The Emergency Solutions Grants project provides operational and programmatic support to Dayton's homelessness support agencies. Funding supports operation of area shelters, rapid re-housing programming, and prevention and diversion programming.

	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> • 3,000 individuals will benefit from the provision of emergency shelter • 200 individuals will benefit from prevention services • 100 individuals will benefit from diversion services
	Location Description	Area shelter operations will occur at the St. Vincent de Paul Gateway Shelter for Women and Families (120 W. Apple Street, Dayton, OH 45402), and the St. Vincent de Paul Gateway Shelter for Men (1921 S. Gettysburg Avenue, Dayton, OH 45417). All other activities under the Emergency Solutions Grants project will be carried out community-wide.
	Planned Activities	The ESG Program planning activities include: <ul style="list-style-type: none"> • Operating support for area shelters • Prevention and Diversion programming • Rapid Re-Housing programming
8	Project Name	CHDO Set-Aside
	Target Area	Community-wide
	Goals Supported	Expand, Maintain, and Improve Affordable Housing
	Needs Addressed	Revitalization of Neighborhoods Quality of Affordable Housing
	Funding	HOME: \$168,248
	Description	HOME funding will be set aside for certified CHDOs for costs associated with HOME-eligible housing projects.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Activities under the CHDO Set-Aside project will be carried out community-wide.
Planned Activities	Planned activities include: <ul style="list-style-type: none"> • CHDO Development Projects 	
	Project Name	HOME Competitive Process

9	Target Area	Community-wide
	Goals Supported	Expand, Maintain, and Improve Affordable Housing
	Needs Addressed	Revitalization of Neighborhoods Quality of Affordable Housing
	Funding	HOME: \$1,241,242 Tax Credits: \$30,100,000 HOME - County Sources: \$200,000 HOME - Other Federal Sources: \$3,490,000 HOME Private Support: \$22,100,000 State Historic Tax Credits: \$1,930,461
	Description	
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	<ul style="list-style-type: none"> • 50 households will benefit from rental rehabilitation • 10 households will benefit from new construction of owner-occupied units
	Location Description	Activities under the HOME Competitive Process project will be carried out community-wide.
	Planned Activities	<p>Proposed activities include:</p> <ul style="list-style-type: none"> • Homebuyer Development Projects (activities funded in the City of Kettering to close out the remaining balance of the Consortium program that ended in 2020). • Down Payment Assistance (activities funded in the City of Kettering to close out the remaining balance of the Consortium program that ended in 2020). • Rental Projects – new construction and rehab

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 of Dayton will primarily direct assistance toward LMI Census block groups where 51% or more of the households earn 80% or less of the Area Median Income.

As documented in the map included in the Grantee Unique Appendices, Dayton's LMI Block Groups exist across the city and cover a majority of the corporation.

Geographic Distribution

Target Area	Percentage of Funds
Community-wide	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The housing, special needs, and community development priorities, established as part of the Consolidated Plan, were developed through a comprehensive public outreach process, which included a community needs survey, focus groups, stakeholder meetings, and a public review process with a high priority on meaningful citizen engagement. The priorities reflect policy directives that have emerged from recent local planning publications, including Dayton Forward, Analysis of Impediments to Fair Housing Choice, Homeless Solutions Community 10 Year Plan, citywide comprehensive plans, and neighborhood strategic plans.

In light of the priorities established to guide the five-year funding period, the system for establishing the priority for the selection of these projects is predicated upon the following criteria:

- Meeting the statutory requirements of the CDBG, HOME, and ESG programs;
- Focusing on LMI areas or neighborhoods in the area;
- Coordination and leveraging of resources;
- Response to expressed needs;
- Sustainability and/or long-term impact; and
- The ability to demonstrate measurable progress and success.

Investments and activities focus on providing housing, services, and assistance to low- and moderate-income individuals and families throughout the entire city, with emphasis placed on census block groups categorized as LMI. In order to meet the statutory requirements of the CDBG program, HUD defines an LMI census block group in the City of Dayton as one in which 51% or more of the population have a

household income at or below 80% AMI.

Discussion

The City of Dayton's activities funded with 2024 CDBG, HOME, and ESG allocations will assist individuals and households city-wide.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Dayton's 2024 Action Plan programs will increase the number of affordable housing units and preserve existing affordable housing for the City's most vulnerable populations. Affordable housing projects include, but are not limited to, providing assistance to LMI households through home improvement and repair activities, homeowner rehabilitation projects, financial wellness and housing counseling services, Fair Housing testing, and down payment assistance programs. Additionally, housing solutions will be provided to homeless individuals through the rapid re-housing, prevention, diversion, and CoC TRA programs.

One Year Goals for the Number of Households to be Supported	
Homeless	300
Non-Homeless	210
Special-Needs	100
Total	610

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

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	30
Rehab of Existing Units	260
Acquisition of Existing Units	0
Total	290

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

Discussion

In 2024, the City of Dayton's affordable housing projects will support approximately 610 homeless, non-homeless, and special-needs households. Projects supporting the creation, maintenance, and improvement of affordable housing include homeowner rehabilitation, creation of new units, Fair Housing testing, and down payment assistance. Approximately 290 of the households assisted will be supported through affordable housing activities that include the production of new rental units and rehabilitation of existing units.

AP-60 Public Housing – 91.220(h)

Introduction

The City's Public Housing Authority, Greater Dayton Premier Management (GDPM), works with area jurisdictions including Montgomery County and the City of Dayton, to ensure GDPM's housing programs and activities align with the current housing needs of the surrounding community.

Jurisdictions provide Consolidated Plan information to GDPM for the Public Housing Authority planning process and completion of the housing needs statement for the PHA Annual Plan, and GDPM also provides input for the local Consolidated Planning processes. Additionally, as the Responsible Entity, the City of Dayton provides support to GDPM in the completion of environmental reviews for their projects.

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

In order to address some of the identified housing needs, GDPM's primary goal is to expand the supply of affordable housing throughout Montgomery County. The specific objectives of this goal include:

1. Apply for additional Housing Choice Vouchers (HCV), where appropriate
2. Acquire and/or build developments to expand GDPM's portfolio offerings
3. Encourage assisted units in private developments throughout Montgomery County
4. Seek partnerships in order to create leverage opportunities for additional housing options

GDPM strives to provide safe and suitable housing for the large number of extremely low-income families in the City of Dayton. Over the next several years, GDPM will utilize HUD's Rental Assistance Demonstration Program (RAD) to rehabilitate and continue to stabilize its portfolio.

Under its most recent Action Plan, GDPM provided information about the redevelopment of Desoto Bass (354 units) and Hilltop Homes (201 units), two of its oldest developments. In 2022, the City and GDPM worked in tandem to progress with the potential redevelopment of the former Daymont site, and in 2023, the site was demolished and redevelopment of new affordable units began. The construction of 50 new affordable units, known as Germantown Crossing, will continue in 2024. Within their portfolio of units, additional modernization plans include a Mixed Finance Development to replace Wilkinson, a Mixed Finance Development to replace Desoto Bass, and potential LIHTC projects. In 2024, GDPM intends to progress with demolition of DeSoto Bass units and demolition of Wilkinson Plaza in preparation of future development of new affordable units.

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

Homeownership Programs

GDPM administers a HCV homeownership program through its Family Self Sufficiency Department (FSS) to provide homeownership opportunities for HCV participants. The HCV homeownership program continuously seeks partnership opportunities to increase participation and leverage resources. GDPM implemented an Individual Development Account program with grant funds from the Ohio CDC Association the program will be available until funds are depleted. Additionally, in connection with a local Community Development Finance Institution, GDPM may seek to expand this program if Capital Magnet Fund resources are awarded to the CDFI.

Community Service and Self-Sufficiency Programs

GDPM operates the HUD Family Self-Sufficiency (FSS), ROSS (Resident Opportunity and Self Sufficiency Coordinator) and Jobs Plus programs in an effort to empower residents toward self-sufficiency. Each program has specific goals and requirements but are all designed to provide access to supportive services and necessary resources to assist residents in increasing their economic position. All the programs are grant funded. GDPM will continue to apply for FSS and ROSS funding, and in 2022, GDPM began implementation of FSS Final Rule requirements. The Jobs Plus program is a placed based program located at AMP 7. The program was scheduled to end in December, 2021 but has continued through additional funding sources.

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

This is not applicable because the Public Housing Authority, Greater Dayton Premier Management, is not designated as troubled.

Discussion

Additional information about upcoming activities, specific details regarding GDPM's planning process, and data regarding the planned support of affordable PHA units can be found at:

<https://www.gdpm.org/about/agency-plans/>

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

Introduction

The City of Dayton participates in the Dayton-Kettering-Montgomery County Continuum of Care Homeless System. Most of the City's projects and programs under the Addressing Homelessness and At-Risk Homelessness goal are implemented through the Dayton-Kettering-Montgomery County Continuum of Care, the Homeless Solutions Policy Board, and local service providers. This system of programs, known as the Front Door Assessment Process, is a coordinated effort to ensure individuals and households receive services that address their specific circumstances surrounding homelessness.

The Homeless Solutions Policy Board and the Continuum of Care are guided by the Homeless Solutions 10-Year Community Plan to end chronic homelessness and reduce overall homelessness within Montgomery County.

The CoC (Continuum of Care) has identified the following performance measures that are a priority to ending homelessness:

1. Length of time persons remain homeless
2. Extent to which persons who exit homelessness to permanent housing return to homelessness
3. Number of homeless persons
4. Jobs and income growth for homeless persons in CoC)- funded projects
5. Number of persons who become homeless

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

Projects for Assistance in Transition from Homelessness (PATH), Cooperative Agreement to Benefit Homeless Individuals (CABHI), and Daybreak Street Programs provide outreach services to sheltered and unsheltered homeless persons.

PATH outreach helps adults and families who are homeless or at risk of homelessness – such as couch-hopping, staying in emergency shelter, or living on the street. PATH goes where homeless individuals stay, visiting and talking with them at places like shelters and free meal sites, under bridges, or at bus stations. PATH encourages participants to seek services and provides referrals to local healthcare agencies, human services, and social services organizations. For those who also have mental health care needs, PATH provides food, clothing, and hygiene products; referrals for counseling and medical care; help to obtain government identification and to apply for benefits; and access to shelter and housing. The ultimate goal is to guide PATH participants from homelessness to permanent housing

and independence.

The CABHI program provides direct client supportive services to assure that unsheltered, chronically homeless individuals, homeless veterans, and chronically homeless veterans that struggle with behavioral health, substance abuse, or co-occurring disorders gain access to permanent supportive housing, case management, benefits, and appropriate behavioral health and substance abuse supports. Once in housing, CABHI services continue up to 12 months to ensure stable housing can be maintained.

Daybreak's Street Outreach Program makes contact with more than 1,500 youth each year who are couch-hopping or living on the street and looking for help. Daybreak provides these youth with basic necessities while helping them find a safe place to live.

Implementation of the Front Door Assessment, the local coordinated assessment process, is overseen by the Front Door Committee, a committee of the Homeless Solutions Policy Board. The Front Door Assessment was adopted to identify the issues that have led to a person or family's homelessness, determine the most appropriate program in the homeless system to help the household exit homelessness and into stabilized housing, and make a referral to that program. The Front Door Assessment is a standardized assessment focused on housing history and barriers to returning to housing. The Front Door is guided by four principles:

1. Rapidly exit people from homelessness to stable housing.
2. Serve clients as efficiently and effectively as possible.
3. Ensure that the hardest to serve are served.
4. Be transparent and accountable through the homeless system.

In 2024, the City is exploring additional funding for street outreach services to support the growing population of unhoused individuals. This may include support for outreach from organization such as the Downtown Dayton Partnership's Downtown Ambassador program and expansion of Miami Valley Housing Opportunity's PATH program. The City continues to bolster its relationship with local providers through ongoing discussions and adjustments to programs to meet the ever-changing landscape of homelessness needs in Dayton.

Addressing the emergency shelter and transitional housing needs of homeless persons

When a household is unable to be diverted from entering the homeless system, the goal is that the Front Door Intake is done within 3 days of entering the shelter. Front Door Intake focuses on the situation that preceded their homelessness, whether they can return to that situation, and if they have the resources to be rapidly rehoused. If the household is still in shelter 7-14 days after entry, then the Comprehensive Assessment is completed. This section of the Front Door Assessment gathers long term history for housing, employment, legal, physical/behavioral health, family/dependent children, and independent living skills. The information is filtered through a Referral Decision Worksheet to determine the level of services a person will need to successfully exit homelessness. In recent years, both Gateway

shelters have seen extensive renovations that increased the availability of beds while providing additional space for case management services associated with the Front Door Assessment.

Once the appropriate program has been determined, the household is either referred directly to the program if they have been determined to be appropriate for Rapid Rehousing, Programmatic Shelter or Supportive Services, or placed on a central waiting list for Transitional Housing, Permanent Supportive Housing or Safe Haven. Several priority criteria are used to determine placement on the permanent supportive housing and Safe Haven waiting lists including homeless for more than 200 days, youth, unsheltered, elderly, and at-risk of death while homeless.

The City of Dayton utilized a substantial portion of its ESG-CV funding to support the rehabilitation of the emergency shelters to better support individuals living in a congregate setting. This includes improvements to dining and recreational/community space, additional space so that beds can be distanced safely, and improvements to the bathrooms to increase health and wellness safety within the emergency shelters. As the pandemic-era funding sources draw to a close, the City will continue to work with its homeless and shelter providers to ensure the emergency shelter and transitional housing needs of homeless individuals continue to be met. Through the HOME-ARP planning process, the City and Montgomery County identified transitional housing needs as potential use for available funds. As implementation of the plan continues, the City will ensure the transitional housing needs of homeless individuals are considered.

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

The Dayton-Montgomery County homeless system is operated with a “Housing First” philosophy and a commitment to exit households to housing as rapidly as possible. The Front Door Assessment supports this approach while also ensuring that households receive appropriate services to end their homelessness. Rapid rehousing programs are primarily targeted to households with income or recent history of income, but can also be used as a bridge housing program for households who are assessed as needing permanent supportive housing, but for whom there are no units currently available.

Households who enter the rapid rehousing program receive financial assistance and services with

some or all of these activities:

- locating housing,
- paying the security deposit and first month's rent,
- turning on utilities,
- moving in and obtaining furniture,
- identifying community resources for support and material assistance,
- enrolling children in school,
- addressing issues that have led to housing instability, or
- obtaining cash and other benefits such as Medicaid and Supplemental Nutrition Assistance Program (SNAP).

Financial assistance for rapid rehousing is initially available to all households in shelter. If they still need assistance after three months, an income certification is conducted to ensure that the household's income is below 30% of AMI. Some individuals will only need one-time assistance based on their recent or current income status. Other individuals will need short-term assistance (1-3 months) or medium-term assistance (4-18 months). Assistance is based on their current inability to meet their housing costs due to job/income loss or some other mitigating factor. It is generally expected that households will receive no more than 6 months of assistance, although this can be waived if appropriate for the household's situation.

All participants are expected to contribute towards their household costs as soon as possible after the housing crisis has been resolved. In most cases, clients are not expected to contribute towards the first month's housing payment; then, a declining level of assistance is provided to help the clients gradually adjust to assuming full responsibility for their housing costs.

Currently there is no maximum length of stay at shelter. Since the priority is on the household's safety, those in shelter are not required to exit without permanent housing identified. Clients are required to accept the first appropriate housing referral made for them. Once a client has exited shelter to housing or a program that will lead to housing, they are not allowed to re-enter shelter for a year. The Homeless Solutions Plan has an overall system goal of reducing length of time homeless to 14 days, and HEARTH has a goal of families being homeless for less than 30 days. With new HMIS reports tracking length of stay, the homeless system will be monitoring the length of stay in shelter and working to develop effective programs to reduce the length of stay as necessary. In addition, the CoC has adopted the OH-505 System Targets, which are performance standards that meet or exceed HUD's performance measures in serving the homeless population.

To further address the permanent housing needs of individuals experiencing homelessness, the City intends to support the construction of additional permanent supportive housing units in partnership with MVHO. This will be further supported through the development of PSH units under the City's desired utilization of HOME-ARP funding toward construction of additional permanent housing for

homeless individuals.

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.

Diversion programming consists of financial assistance and negotiation practices aimed at helping households remain in their current source of housing or transfer to an alternative housing plan without the household having to stay in the shelter. The financial assistance in Diversion Programming can pay arrears to prevent the loss of housing or be used to secure new housing as appropriate to the household's situation. Households also receive case management services to stabilize them in their new or existing housing and connect them to community resources. Households who previously have been homeless are the main priority for prevention and diversion services at the main gateway shelters. Families who request entry to shelter who are assessed as having no other resources are also priority households for prevention assistance because of the detrimental effect of homelessness on children. Financial assistance is only provided to households who meet income and other eligibility criteria. Other households seeking assistance are referred to other community resources, which are very limited.

Dayton and Montgomery County have made a significant commitment to reduce the number of people entering shelter, reduce the length of time people remain in shelter, and reduce the rate of recidivism amongst the homeless population. Starting in the fall of 2011, all families requesting shelter at St. Vincent were required to meet with case managers before they entered shelter. Using the Front Door Intake section of the Front Door Assessment, the case manager works with the family to see if they have any alternative housing options to entering the shelter.

Discussion

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

Introduction:

Dayton’s housing market is generally regarded as affordable, especially in the context of comparably sized communities nationally. According to 2022 American Community Survey 5-Year Estimates, Dayton's median gross rent of \$830 per month is \$438 lower than the national median gross rent, which often helps Dayton rank within the most affordable housing markets nationwide.

Due to steady population decline and heightened foreclosures, Dayton also has a high vacancy rate in both private-market rental units and several of its large, older public housing sites. Vacancies often trend prices downward, resulting in a less competitive market with a wide variety of housing opportunities that is more affordable to lower-income renters.

Despite the prevalence of affordably priced housing opportunities in Dayton, rental and owner property remain out of reach for some populations. Those least likely to be able to afford either private market rentals or even Section 8 housing are families and individuals with incomes below \$26,500 (less than 30% of AMI for a family of 4). This income category experiences the highest risk of homelessness. These are the households for whom only the deep subsidies traditionally provided by public housing, provide affordable housing.

With a decreasing population, and in spite of an aggressive housing demolition program, Dayton has more supply than demand, which results in increased vacancy rates, abandoned and vacant property, and a “soft” market with lower rents and sale prices. While recent market trends show strengthening in rent prices and sale values, Dayton’s market is relatively affordable when compared to other regions.

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

There are several factors that affect the quality, accessibility, and maintenance of affordable housing in Dayton. The primary issue that impedes efforts to preserve and improve Dayton’s inventory of affordable housing is the high cost of maintenance and renovation of older housing units. More than 84% of the City’s housing stock is over 50 years old, increasing the likelihood that an affordable housing unit needs costly and substantial repairs, rehabilitation, or abatement of lead hazards. This issue of affordability was dramatically impacted by the COVID-19 pandemic, with inflation and supply chain issues substantially increasing the costs of materials and labor associated with rehabilitation projects. Affordability has also been impacted by the continued diminishment of elasticity within local housing markets.

To help LMI households, the City will continue to fund a variety of home repair programs through its

established housing partners such as County Corp, Rebuilding Together Dayton, and CityWide Development Corporation. Furthering this relationship, the City is providing greater support through its Housing Inspection Division so that individuals who may be unable to afford or unable to physically complete the repairs needed to remedy a citation or violation will be connected directly to organizations and services that may assist. Support for home repair activities will be further encouraged through implementation of the Dayton Recovery Plan (DRP), Dayton's plan guiding the utilization of its allocation of the American Rescue Plan. Under the DRP, the City allocated \$55 million toward neighborhood improvements, including \$15.8 million for demolition, \$18.7 million for housing improvement and new construction, and \$8.7 million for park and amenity improvements.

In support of increased and strengthened homeownership, the City continues to fund mortgage counseling, financial literacy training, and downpayment assistance through its CDBG program.

In a city where more than half (51%) of its households are renters, attention must be given to the process for retaining good renters and continually attracting residents who do not desire homeownership. The City of Dayton continues to re-evaluate and develop strategies that encourage committed investors, diversify the rental-housing product, and modernize existing units. To assist renter households, the City of Dayton continues to aggressively pursue the demolition of substandard and obsolete housing, while promoting the construction of new, modern affordable rental units in desirable locations. For households interested in pursuing homeownership, the City continues to support homebuyer assistance and housing counseling programs aimed at preparing households for the journey toward homeownership.

The City will continue to encourage good-quality affordable housing, ensure that current homeowner investments are protected, and provide support to ensure that future homeowners realize appreciation on their investments. The City will serve the population of renters – who comprise half of its households – by continuing to support committed investors, diversifying the rental housing product, and modernizing existing units. As the population of Dayton becomes increasingly diverse, emphasis will be placed on encouraging racial and economic integration, as well as the dispersal of special needs populations throughout the community. While striving to protect and support affordable housing production, the City applied for the 2023 Pathways to Removing Obstacles to Housing (PRO Housing) Program. The City was not awarded, but will re-apply to make catalytic change to the City's current operations in a way that streamlines procedures, updates zoning laws and land use policies that impact affordable housing development, and supports strengthened infrastructure and amenities within neighborhoods.

Discussion:

The City of Dayton has contracted with the Miami Valley Fair Housing Center to update its regional Analysis of Impediments (in partnership with Montgomery County and the City of Kettering). This agreement began at the end of 2021 and MVFHC continues to complete all necessary testing, data collection, and research for the AI update.

Additionally, the City has a long-standing partnership with Miami Valley Fair Housing Center to provide fair housing education and outreach program. The most recent CDBG-funded agreement expired at the end of 2022, but MVFHC is anticipated to apply via the upcoming CDBG Competitive Process. Dayton's focus on fair housing and partnership with MVFHC is furthered through the Human Relations Council (HRC). The HRC is certified as a substantially equivalent agency with the United States Department of Housing and Urban Development (HUD). This means that HUD has determined that the City of Dayton enforces a law that provides substantive rights, procedures, remedies, and judicial review provisions that are substantially equivalent to the federal Fair Housing Act.

Through its Civil Rights Enforcement Program, Dayton HRC enforces the City's anti-discrimination ordinances (RCGO 32.02-32.21 and 32.99) and further supports fair housing practices within the city.

AP-85 Other Actions – 91.220(k)

Introduction:

While advancing the implementation of the 2021-2025 Consolidated Plan and the 2024 Action Plan, the City of Dayton will address several additional items as described below.

Actions planned to address obstacles to meeting underserved needs

The largest obstacle to meeting underserved needs is the limited amount of funding available for addressing needs throughout the community. As unemployment rates fluctuate, homelessness and at-risk homelessness persists, and the demand for supportive services intensifies, the strain of limited funding becomes apparent. As a result of the general economic disinvestment and diminished tax base experienced over the past two decades, the City of Dayton has fewer resources available to address the increasing community needs.

Limited funding resources compound the additional obstacle of affordability – the gap in what households can afford to pay for housing and the price of housing. The City of Dayton has lost a considerable portion of its population during the last decade, resulting from diminished employment opportunities and a relatively stagnant local economy. The population loss has supported Dayton’s significant affordable housing stock, yet household income level is still frequently insufficient to afford even the lowest of the market-rate units.

To address these obstacles, the City continues to advance its strategies for stemming population loss and maximizing the limited resources that are available through local partnerships. Annually, the City will continue to host a competitive process for its CDBG and HOME funding. Through this process, organizations will be awarded higher scores for applications that leverage outside resources as a portion of the project.

The City continues to strive to stem population loss by attempting to retain college graduates through homebuyer incentive and financial assistance programs, and to attract private investment through economic development activities such as façade improvement programs. By increasing economic opportunity, households may be better able address the affordability gap in housing.

Though funding for community development needs continues to trend downward nationwide, the City of Dayton attempts to address this obstacle through local partnerships. Partnering with other public agencies and non-profit organizations allows local partnerships to maximize leveraged resources and amplify housing and community development outcomes. To further support these partnerships and encourage new projects to address the needs of residents, the City of Dayton continues to explore additional federal funding sources. Funding for lead hazard remediation, lead hazard program development, and additional support for homeless populations through new Continuum of Care resources are examples of the funding sources the City hopes will provide additional resources toward

the needs of Dayton residents. While striving to protect and support affordable housing production, the City applied for the 2023 Pathways to Removing Obstacles to Housing (PRO Housing) Program. The City was not awarded, but will re-apply to make catalytic change to the City's current operations in a way that streamlines procedures, updates zoning laws and land use policies that impact affordable housing development, and supports strengthened infrastructure and amenities within neighborhoods.

Actions planned to foster and maintain affordable housing

The City of Dayton will continue to work with area housing providers, non-profits, and developers to stabilize the housing stock. The developer for every federally funded tax credit project built within the City of Dayton is required to demolish two vacant or obsolete homes for every new affordable single-family structure built. The City continues its efforts to equip residents with tools to become good homeowners through its mortgage credit counseling classes held throughout the year, as well as financial wellness programming.

Half of Dayton's households are renters. In order to keep good renters and attract those who do not desire to be homeowners, the City continues to re-evaluate and develop strategies that support committed investors, diversify the rental-housing product, and modernize existing units. To assist renter households, the City of Dayton continues to aggressively pursue the demolition of substandard and obsolete housing, while promoting the construction of new, modern affordable rental units in desirable locations.

Additional tools for fostering and maintaining affordable housing include homeowner rehabilitation programs aimed at helping homeowners, especially seniors, stay within their homes. Repairs and rehabilitation efforts focus on external repairs and accessibility modifications to roofs, windows, walkways, and porches, while internal repairs focus on major home systems, improvements for safety and livability, and accessibility modifications and supports. The City also supports fair housing testing to ensure that all individuals have equal access within the City's housing market.

With limited resources, the City of Dayton continues to face the challenge of meeting the needs of its lowest-income residents. In Dayton, a long-term population decline has left a weakened tax base and many deteriorating abandoned structures, which decreases property values and invites nuisance activity. This has resulted in an increase of affordable but substandard housing stock. Dayton has previously set aside large CDBG allocations for code enforcement, but in light of the limited effectiveness of identifying rather than rehabilitating deficient properties, the City intends to shift its focus to activities that more directly increase the quality of the housing stock.

While striving to protect and support affordable housing production, the City applied for the 2023 Pathways to Removing Obstacles to Housing (PRO Housing) Program. The City was not awarded but will re-apply to make catalytic change to the City's current operations in a way that streamlines procedures, updates zoning laws and land use policies that impact affordable housing development, and supports

strengthened infrastructure and amenities within neighborhoods.

During the 2024 Program Year, the City of Dayton will encourage affordable housing developers that support home construction, repair, and rehabilitation programs to directly increase the quality and availability of affordable housing via application for the CDBG Competitive Process. Financial wellness, financial literacy, housing counseling, and down payment assistance programming is supported through the utilization of CDBG funding, and public service providers will also be encouraged to apply for competitive CDBG funding. In 2022, the City was able to restart its HOME program, and has since provided funding support to the development or maintenance of affordable rental housing units within the city.

Programs funded with entitlement grants include Grand Place Senior Housing, Hoover Place Senior Housing, Germantown Crossing, Kinship Family Housing, County Corp's Home Repair and Accessibility Program, and direct assistance to homebuyers through the HomeOwnership Center of Greater Dayton.

Actions planned to reduce lead-based paint hazards

The City of Dayton recognizes that cooperation among public and private organizations is essential for successful lead-based hazard reduction efforts. In that spirit, the City continues to work toward reducing lead-based paint hazards through partnerships with Public Health Dayton and Montgomery County, Citywide Development Corporation, CountyCorp, Montgomery County, and lead contractors. Managing lead-based paint and other environmental regulations can significantly increase the cost burden of renovating older housing stock typically found in inner-city neighborhoods. The principal objective is to provide cost-effective methods for controlling lead while maintaining affordable housing for low-and moderate-income families. During the next five years, the City of Dayton's efforts will include the following:

- Lead paint assessments will be performed by Public Health on City of Dayton properties,
- Housing Inspection will continue to educate Dayton residents about lead paint hazards as part of its code enforcement efforts,
- Properties will be made lead-safe through rehabilitation programs,
- Blood tests will be conducted throughout Montgomery County, and
- Dayton will continue to aggressively demolish pre-1978 nuisance housing, which often contains lead-based paint.

The City of Dayton intends to apply for the capacity-building Lead Hazard Reduction Grant NOFO in 2024. Through this grant opportunity, the City intends to develop a stronger relationship with Public Health Dayton-Montgomery County and the Ohio Department of Health to establish the programming, blood lead testing, technical assistance, and certification programs that will support the development of

a strong lead hazard reduction program in the City of Dayton.

Actions planned to reduce the number of poverty-level families

The City of Dayton is dedicated to making housing more affordable, preserving and increasing availability of existing housing stock, and helping residents build assets of all kinds: human, social, financial, physical, and natural. To this end, the Cities and their community partners have incorporated an integrated system of services and programs to meet the various needs of individuals as they progress toward financial self-sufficiency.

The City continues to support organizations that provide emergency shelter, transitional housing, and supportive social services to mitigate poverty and the problems associated with it. In addition to supporting these programs, the City of Dayton continues to directly impact some of poverty's primary causal factors – poor-quality housing, expensive housing, lack of education, unemployment, low income, and ill health – by utilizing its resources, including housing stock, social services provided by subrecipients, employment opportunities, public health guidance, and the educational system. The multiple aspects of the programs run by the Cities or their subrecipients, when working in together, have the ability to reduce the number of households with incomes below the poverty level.

Additionally, the City continues to fund workforce training and development initiatives aimed at providing potential members of the workforce with vital training, soft skills, certifications, and additional workforce development programs. One such program provided by Daybreak teaches vital employment skills to homeless youth in Dayton and provides employment coaching as youth transition from the workforce training program into the Dayton employment landscape. By providing these opportunities, families are able to gain the skillsets and certifications needed to obtain higher-paying employment.

The City of Dayton participates in an interagency coalition to promote the Earned Income Tax Credit (EITC) and Child Tax Credits (CTC) to City residents. The EITC/CTC Program is currently the largest anti-poverty effort in the country. The EITC/CTC Coalition can boast a broad spectrum of committed partners including community volunteers, the United Way of the Greater Dayton Area, Montgomery County, private banks and credit unions, non-profit community organizations, the IRS, and other public organizations such as Sinclair Community College. The EITC/CTC outreach campaign and free tax assistance is another means of assisting LMI residents, while also helping the local economy by increasing disposable income. The coalition continues to work together to expand the program each year. To build upon the success of the City's current EITC program, the Department of Planning, Neighborhoods, and Development has proposed utilizing American Rescue Plan Act (ARPA) funding to establish the Dayton Racial Equity Fund. Much like the Individual Development Account (IDA) Program established by GDPM, Dayton wishes to partner with local financial institutions and community development organizations to build a network of pathways that give participants the opportunity to build wealth, achieve homeownership, mitigate debt, attend school, pursue entrepreneurship, or establish savings. Through partnerships and the leveraging of both existing programs and funds, DREF

has the opportunity to become a transformative model toward addressing the impacts of systemic racism and provide financial stability for Dayton residents.

Actions planned to develop institutional structure

The Department of Planning, Neighborhoods, and Development of the City of Dayton is responsible for managing the vast network of public agencies, private service providers, and local non-profit organizations through which it will carry out the Consolidated Plan. This department has the lead responsibility for coordinating the development of the Consolidated Plan and the development and timely implementation of each annual action plan. In administering its programs, the City works cooperatively within a landscape of local, state, and regional agencies.

Several City of Dayton departments and agencies are involved in the implementation of the Consolidated Plan, including the Office of Economic Development, Department of Public Works, Department of Recreation and Youth Services, Department of Management and Budget, Dayton Municipal Court, and the Dayton Human Relations Council. To further develop the existing institutional structure and coordinate development efforts, we will continue to work with other city departments on projects and activities across the city. This will ensure that key communication and leveraging efforts are fully supported. GDPM will continue its role as primary provider of low-income public housing and administrator of Section 8 programs. The Shelter Policy Board will be the lead agency with which the City will partner to provide policy guidance and oversight for addressing the needs of the homeless.

Resulting from the City's 2019 Memorial Dayton Tornado Outbreak and recovery efforts from the COVID-19 global pandemic, many of the partnerships and intra-agency groups established for emergency need have become permanent in nature. The City's Long-term Recovery Group continues to meet and address additional needs for the area impacted by the tornadoes. The lessons and experiences from this group have helped with the establishment of smaller groups focused on funneling resources toward the most pressing issues within neighborhoods and identified community areas. Both the Long-term Recovery Group and the partnerships created during the pandemic continue to work to leverage limited resources to support transformative local projects.

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

Within the City of Dayton, there are a multitude of organizations and agencies that serve special needs populations. These organizations include, but are not limited to, ADAMHS, Dayton VA Medical Center, Eastway Behavioral Health, Samaritan Behavioral Health, Kettering Behavioral Health, Goodwill Easter Seals of the Miami Valley, Homefull, and Places. As noted in the Montgomery County Family Resource Guide, there are 15 organizations that provide addiction treatment services, 12 organizations that provide mental health services, 13 agencies that provide community services, 6 agencies that provide special needs services, 7 area hospitals and 8 health centers, and 3 organizations focused on

employment services.

The Dayton-Kettering-Montgomery County Continuum of Care (CoC) includes an established collaborative system of partnerships aimed at addressing the housing needs of the region's populations that are homeless or at-risk of becoming homeless. In place with regards to housing. There needs to be the same comprehensive continuum in regard to service providers and in conjunction with supportive housing to ensure that the special needs populations are receiving the services they need to develop the life skills required for continuous housing. Through discussions regarding the match requirements for the City's TRA grant, the City, MVHO, Montgomery County, and the Greater Dayton Area Hospital Alliance have started conversations around increasing services and supportive models for vulnerable populations at greater risk of homelessness.

Provision and coordination of public services is a Priority Need within the 2021-2025 Consolidated Plan. The City will administer activities to encourage coordination with existing service providers for increasing youth and senior activities; expanding educational and tutoring programs; addressing the need for addiction services and marketing existing services; and working with Montgomery County in a concerted effort to develop a coordinated service delivery system.

As stated previously, the long-term recovery efforts from the Memorial Day tornadoes and the organizational efforts surrounding the local response to COVID-19 amplified coordination among local jurisdictions, organizations, and supportive agencies. Both large-scale "disasters" highlighted natural areas of collaboration, streamlined communication pathways, and strengthened coordination among local jurisdictions, organization, and supportive agencies. As repair, relief, and response efforts continue and/or wind down, the City will continue its supportive role in ensuring organizations receiving City funds are providing necessary services that support impacted residents while also ensuring efforts coincide with the efforts and activities proposed and implemented across the region. The long-term effects of increased partnership have led to joint applications toward multiple funding opportunities at the federal and state level. Additionally, local partners have streamlined many of their applications and are consolidating intake processes to reduce overhead burden while increase the leverage and reach of available funding.

Discussion:

.

Program Specific Requirements

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

Introduction:

The City of Dayton will utilize its CDBG, HOME, and ESG funding to support a variety of programs and activities throughout the City’s neighborhoods and business corridors. A majority of the City’s CDBG funding will be utilized to support low- and moderate-income persons and households, while the remaining balance of CDBG funding will support the removal of slum/blighted properties and administrative support. Activities funded with CDBG funding include home repair and rehabilitation programs, economic development activities, public services, infrastructure improvements, and demolition of slums and blight. When made available, HOME funds will predominately be used to support Low Income Housing Tax Credit (LIHTC) projects throughout the City. ESG funding will be utilized to fund operation of area shelters, prevention, and rapid-rehousing programs.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

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

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

**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:

This section is not applicable because the City of Dayton will not be utilizing other forms of investment beyond those identified in Section 92.205.

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:

Current Dayton HOME Program

Beginning in 2022, the City of Dayton has been authorized to commit HOME funding toward only rental rehab and new construction projects. At this time, new homeowner activities are not anticipated.

Recapture - Prior Dayton/Kettering Consortium Projects

Per 24 CFR 92.150, the Dayton/Kettering HOME Consortium established recapture guidelines for the operation of HOME-funded homeownership programs. These guidelines are to be adhered to for all homeownership programs administered by the Consortium or any designee, including subrecipients and Community Housing Development Organizations (CHDOs) designated by the Consortium.

The guidelines are based on 24 CFR 92.254 (a)(5)(ii), which stipulates the conditions for recapture of the HOME investment used to assist low-income families acquiring a home. Two factors that are important in developing the guidelines are the fair return to the buyer at time of sale as well as ensuring that the homeowner was not in a negative equity position. It is also important to realize that there are two forms of subsidy; a subsidy on the development cost of a project which brings the total project cost down to the market value of the house to be sold, and a subsidy to the homebuyer that lowers the cost of the house from market value to a price affordable by the buyer. These factors along with other policies determines the amount of HOME funds to be recaptured.

Given these considerations, the amount of HOME funds recaptured would be equal to the *difference* between the *appraised value of the house and the price paid by the buyer*, not to exceed the total amount of HOME funds in the project. This amount would become the HOME second mortgage. The

balance of HOME funds in the project, if any, is deemed to have been a development subsidy and will not be recaptured.

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:

Current Dayton HOME Program

Beginning in 2022, the City of Dayton has been authorized to commit HOME funding toward only rental rehab and new construction projects. At this time, new homeowner activities are not anticipated.

Recapture - Prior Dayton/Kettering Consortium Projects

Pursuant to CPD Notice 12-003, the City of Dayton Consortium, will base the recapture amount on the net proceeds available from the sale rather the entire amount of the HOME investment.

The minimum length of time in which the recapture provisions will be in force depends on the amount of HOME funds subject to recapture as described above:

Amount of HOME Funds	Period of Time
Less than \$15,000	5 Years
\$15,000 to \$40,000	10 Years
More than \$40,000	15 Years

If the low-income homebuyer does not reside in this property (as the principal residence) for the applicable period, the Consortium will enforce one of the following two recapture methods as allowed under the HOME guidelines:

1. Shared net proceeds, or
 2. Reduction during the affordability period
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:

The City of Dayton has multiple HOME projects that intend to utilize HOME funding for the

refinancing of existing debt secured by a multifamily housing project.

In 2024, it is anticipated that Hoover Place Senior Apartments will be entered into IDIS. This project utilized HOME funding in 2023 to refinance existing debt.

To determine the eligibility of such refinancing, the City has a multi-pronged approach during the underwriting, cost allocation, and project review period.

1. Certification of Rehabilitation - The City certifies that on each project seeking funds for refinance, rehabilitation is the primary eligible activity on the project. On projects seeking refinancing, the rehabilitation threshold must be at or above \$85,000 in TDC per unit.
 2. Disinvestment - During the underwriting process, the City reviews the proforma, sources and uses, and rent rolls to ensure each project is financially stable. Through this review, staff confirms that disinvestment within a property has not occurred, that the property will continue to be fiscally sound, and that the LMI populations served through the project will continue to be served throughout the lifespan of the project.
 3. Creation & Retention of Affordable Units - The City of Dayton intends to utilize refinancing of existing debt to support projects that both retain/maintain existing affordable units and projects that create additional affordable units.
 4. Affordability Period - the affordability period for refinancing of existing debt is 15 years.
 5. Geography - refinancing of existing debt under the HOME program will be available to projects city-wide.
 6. Certification of Federal Loan Status - The City of Dayton certifies that it will not refinance multifamily housing loans or loans insured by any Federal program including CDBG.
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 Dayton does not utilize HOME funding for TBRA activities.

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)).

The City of Dayton does not utilize HOME funding for TBRA activities.

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).

This is not applicable.

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The City of Dayton is a participating jurisdiction in the Dayton-Kettering-Montgomery County Continuum of Care (Continuum) and the associated Homeless Solutions Policy Board. The Homeless Solutions Policy Board (HSPB) is the primary agency that manages the funding and programs associated with the Emergency Housing Coalition and Continuum of Care. HSPB allocates the collective funding of its partner jurisdictions, establishes performance standards, and provides program evaluation for the local CoC and ESG programs. Both the HSPB and the Continuum are guided by the Homeless Solutions 10-Year Community Plan, the guiding document for programs to end chronic homelessness and reduce overall homelessness within Montgomery County.

Both the City of Dayton's policy and procedures manual and the Homeless Solutions 10-Year Community Plan are attached to the 2024 Action Plan as Grantee Unique Appendices.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Implementation of the Front Door Assessment, the local coordinated assessment process, is overseen by the Front Door Committee, a committee of the Homeless Solutions Policy Board. The Front Door Assessment was adopted to identify the issues that have led to a person or family's homelessness, determine the most appropriate program in the homeless system to help the household exit homelessness and into stabilized housing, and make a referral to that program. The Front Door Assessment is a standardized assessment focused on housing history and barriers to returning to housing.

The Front Door is guided by four principles:

1. Rapidly exit people from homelessness to stable housing.
2. Serve clients as efficiently and effectively as possible.
3. Ensure that the hardest to serve are served.
4. Be transparent and accountable through the homeless system.

In addition, Miami Valley Housing Opportunities' PATH program, which serves people on the streets that are not willing to enter a shelter, also conducts the Front Door Assessment.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

As stated above, the City of Dayton participates in the Dayton-Kettering-Montgomery County Continuum of Care and the Homeless Solutions Policy Board. The Homeless Solutions Policy Board is the primary agency managing the Emergency Housing Coalition and Continuum of Care. It is through this Policy Board that the allocation of funding, performance standards and program evaluation for the Dayton / Kettering / Montgomery County Continuum of Care programs, including the ESG Program, are implemented. The Homeless Solutions Policy Board and the Continuum of Care are guided by the Homeless Solutions 10-Year Community Plan to end chronic homelessness and reduce overall homelessness within Montgomery County.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

This is not applicable because the City of Dayton is able to meet the homeless participation requirement in 24 CFR 576.405 (a).

5. Describe performance standards for evaluating ESG.

The Homeless Solutions Plan has an overall system goal of reducing length of time homeless to 14 days, and HEARTH has a goal of families being homeless for less than 30 days. With HMIS reports tracking length of stay, the homeless system is able to monitor the length of stay in shelter and continues to work toward development of effective programs to reduce the length of stay as necessary.

Through the Homeless Solutions Policy Board, Dayton has representatives on the Program Performance & Evaluation Committee (formerly the Continuum of Care Committee), taking an active role in ensuring that the Continuum of Care's programs are effective and that the Continuum of Care is compliant with HEARTH regulations.

Per 576.201, grantees must make matching contributions to supplement the ESG program at 100% of the annual allocation. The City of Dayton certifies that all activities funded through ESG include a match that is equal to or greater than the total amount of ESG funds provided to the activity. The match is provided by the subrecipient, and is verified at the time of contracting as well as during the annual CAPER. Match dollars are not available for 2024 because annual allocations have not been awarded yet.

However, the City's 2023 ESG activities provided nearly \$300,000 in match toward shelter operations, and over \$200,000 in match toward prevention, diversion, and rapid re-housing activities.

Attachments

Citizen Participation Comments

City of Dayton
2024 Action Plan
Citizen Participation Comments

Contents

- Summary of Public Comments
 - Draft Development Phase – Public Comment Period
 - Draft Development Phase – Public Hearing
 - Allocation Finalization – CNDAB Update
- Proof of Publication – Public Comment Period & Public Hearing

Summary of Public Comments

**Draft Development Phase
Public Comment Period
October 18 – November 17, 2023**

No comments were received during the public comment period.

**Draft Development Phase
Public Hearing #1
November 13, 2023 – 4:30 PM**

The public hearing on the draft Action Plan was held at a Community and Neighborhood Development Advisory Board (CNDAB) meeting in the Mezzanine Floor in the Planning Resource Center, 101 West Third Street, Dayton, Ohio 45402. The meeting and public hearing was also held in a virtual format through Teams, and public participants were able to request a link via email or utilize the provided Teams link to attend the meeting.

No comments were received during the public hearing on November 13, 2023.

**Allocation Finalization
CNDAB Meeting
June 10, 2024 – 4:30 PM**

The Community and Neighborhood Development Advisory Board (CNDAB) meeting was held in a virtual format and public participants were able to request a link via email or utilize the provided Teams link to attend the meeting.

No comments were received during the 2024 Action Plan allocation update on June 10, 2024.

Proof of Publication in Dayton Daily News - ePaper Public Hearing & Public Comment Period

Academy Health Attn: Niraj Patel -
3320 OFFICE PARK DR Dayton OH
45429: bed frame, chairs, mattress,
trash can, and miscellaneous items.
10-20, 10-27/2023

0000811331-01



PUBLIC HEARING NOTICE CITY OF DAYTON, OHIO City of Dayton 2024 Action Plan Projection

The City of Dayton will hold a public comment period and public hearing on the 2024 Action Plan Projection. The City of Dayton's 2024 Action Plan Projection outline the planned use of federal entitlement funds from the U.S. Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships (HOME) programs.

A presentation and public hearing will take place at the Community & Neighborhood Development Advisory Board (CNDAB) meeting on Monday, November 13, 2023, at 4:30pm. The meeting will be held both virtually and in-person in the Planning & Resource Center on the Mezzanine, City Hall, 101 W. Third Street, Dayton, Ohio 45402.

Draft copies of the Action Plan Projection are available for review. To request draft copies of the document, obtain additional information, request a virtual meeting invitation, or submit a comment, please contact Beth Wilson, Department of Planning and Community Development at (937) 333-3688 or beth.wilson@daytonohio.com.

The City of Dayton will accept written comments on the 2024 Action Plan Projection from Wednesday, October 18, 2023, until 5:00pm on Friday, November 17, 2023.

10-27/2023

0000812441-01



DIVORCE NOTICE
Keara Dever (Attorney)
2621 Dryden Rd, Suite 306
Dayton, OH 45429-1600

Ashley Bowling (Defendant)

whose last known place of residence was:

616 Roy Ave, Apt 5
Dayton, OH 45419

for Plain-
44 Indian
reek, OH

10811206-01



OHIO
DGE
ENOUGH,

**Proof of Publication – Public Hearing #2
Non-Substantial Amendment – Update to Allocation
City Notice of CNDAB Meeting – June 10, 2024**



Department of Planning,
Neighborhoods & Development

City Hall
101 W. Third Street
P.O. Box 222
Dayton, OH 45401
(937) 333-2679 / Fax (937) 333-4291
www.daytonohio.gov

TO: CNDAB Members and City Staff

FROM: Beth Wilson, CNDAB Secretary
Department of Planning, Neighborhoods and Development

SUBJECT: June 10, 2024 – CNDAB Meeting Agenda

The agenda for the Monday, June 10, 2024, meeting of CNDAB is as follows:

1. Call to Order, Roll Call
2. 2024 Action Plan Update
3. Announcements
4. Adjournment

Virtual Link:

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 228 233 751 857

Passcode: rdkQfr

Dial in by phone

[+1 937-249-5950, 918024702#](#) United States, Dayton

[Find a local number](#)

Phone conference ID: 918 024 702#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

Grantee Unique Appendices

City of Dayton
2024 Action Plan
Grantee Unique Appendices

- 2024 Action Plan – Resource Allocation Summary
- 2024 Action Plan – Resolution
- Map – LMI Block Groups
- Citizen Participation Plan
- ESG Policies and Procedures
- Homeless Solutions Plan

2024 Action Plan – Resource Allocation Summary

**2024 Action Plan
Community Planning and Development Resource Summary**

	2023 Action Plan	2024 Action Plan
1. Entitlement Grants	\$ 7,763,695.00	\$ 7,102,514.41
CDBG	\$ 5,708,055.00	\$ 5,479,181.00
ESG	\$ 500,633.00	\$ 501,678.00
HOME	\$ 1,555,007.00	\$ 1,121,655.41
HOME-ARP	\$ -	\$ -
2. Prior Years' Program Income NOT previously programmed or reported	\$ -	\$ -
CDBG	\$ -	\$ -
ESG	\$ -	\$ -
HOME	\$ -	\$ -
3. Reprogrammed Prior Years' Funds	\$ -	\$ -
CDBG 2016 and 2017	\$ -	\$ -
ESG	\$ -	\$ -
HOME	\$ -	\$ -
4. Estimated Program Income	\$ 50,180.39	\$ 425,000.00
CDBG - City ¹	\$ -	\$ -
CDBG - Subrecipient ²	\$ 34,637.52	\$ 25,000.00
ESG	\$ -	\$ -
HOME ³	\$ 15,542.87	\$ 400,000.00
5. Section 108 Loan Guarantee Funds	\$ -	\$ -
Total Funding Source - CDBG	\$ 5,742,692.52	\$ 5,504,181.00
Total Funding Source - ESG	\$ 500,633.00	\$ 501,678.00
Total Funding Source - HOME	\$ 1,570,549.87	\$ 1,521,655.41
Total Funding Source - HOME-ARP	\$ -	\$ -
Total - All Funding Sources	\$ 7,813,875.39	\$ 7,527,514.41

Notes

1. Program income for CDBG is comprised typically of the proceeds from the sale of CDBG purchased property, payments from property owners for demolition charges and miscellaneous refunds/rebates.

2. Anticipated loan repayments from the Small Business Resource Assistance Program (SBRAP) and the Housing Maintenance Opportunities Program

3. Program income for the HOME program will come from loan repayments from HMOP, recaptured funds from Down Payment Assistance Program, and

CDBG **decrease** of 4.00% (\$228,874.00)

ESG **increase** of 0.20% (\$1,045.00)

HOME **decrease** of 27.87% (\$433,352.00)

**2024 Action Plan
CDBG Summary**

	2023 Action Plan	2024 Action Plan
Subtotal Planned CDBG Funds Allocated	\$ 5,742,693	\$ 5,504,181.00
	5,742,693	\$ 5,504,181.00
Housing Stabilization and Improvement Program	\$ 1,030,000	\$ 1,000,000.00
Nuisance Abatement Program	850,000	\$ 850,000.00
PCD Project Delivery Costs - Housing	30,000	\$ -
Competitive Projects - Housing	150,000	\$ 150,000.00
Economic Development Program	\$ 119,638	\$ 100,000.00
Small Business Resource Assistance Program	34,638	\$ 25,000.00
PCD Project Delivery Costs - ED	10,000	\$ -
Competitive Projects - Economic Development	75,000	\$ 75,000.00
Public and Social Service Support Program	\$ 296,883	\$ 196,196.00
Operation Charlie	90,000	\$ 90,000.00
PCD Project Delivery Costs - Public & Social Services	20,000	\$ -
Competitive Projects - Public & Social Services	186,883	\$ 106,196.00
Infrastructure and Neighborhood Conservation Prog.	\$ 3,170,000	\$ 3,125,000.00
Residential Asphalt Resurfacing	1,800,000	\$ 1,800,000.00
Alley Resurfacing	400,000	\$ 400,000.00
Neighborhood Improvement Projects	150,000	\$ 125,000.00
Internal Competitive Process	800,000	\$ 800,000.00
PCD Project Delivery Costs - Infrastructure	20,000	\$ -
Community Planning	241,500	\$ 241,500.00
Planning Services	241,500	\$ 241,500.00
Grant Program Administration and Compliance	\$ 884,672.00	\$ 841,485.00
Division of Community Development - Grants Administration	740,000	\$ 725,000.00
CDBG Grant Admin. Misc.	28,187	\$ -
Indirect Costs	116,485	\$ 116,485.00

- A Amendment
- SA Substantial Amendment
- O Operating Program

**2024 Action Plan
ESG Summary**

	2023 Action Plan 10/3/2022	2024 Action Plan
Subtotal Planned ESG Funds Allocated	\$ 500,633	\$ 501,678
	\$ 500,633	\$ 501,678
Operating Support for Area Shelters	\$ 300,379.80	\$ 301,006.80
Prevention, Diversion, and Rapid Re-housing Progra	\$ 200,253.20	\$ 200,671.20

2024 Action Plan HOME Summary

		2023 Action Plan	2024 Action Plan
Total HOME-ARP Funds Allocated		\$ -	\$ -
Total HOME Funds Allocated		\$ 1,570,550	\$ 1,521,655.41
		\$ 1,570,550	\$ 1,521,655.41
HOME Project Subtotal		\$ 1,570,550	\$ 1,521,655.41
	City Administration	155,500	\$ 112,165.00
	CHDO Administration	-	\$ -
	HOME Rental Projects	1,181,799	\$ 1,241,242.41
	<i>Rental Projects</i>	1,181,799	\$ 1,241,242.41
	HOME Homebuyer Programs	-	\$ -
	<i>Development</i>	-	\$ -
	<i>Downpayment Assistance</i>	-	\$ -
	HOME-ARP	-	\$ -
	<i>Administration & Planning</i>	-	\$ -
	<i>Rental Housing</i>	-	\$ -
	<i>Supportive Services</i>	-	\$ -
	<i>Non-Congregate Shelter</i>	-	\$ -
	<i>Non-profit Operating & Capacity Building</i>	-	\$ -
CHDO	CHDO Set-Aside	233,251	\$ 168,248.00

KEY	A	Amendment
	SA	Substantial Amendment
	CHDO	Certified CHDO

2024 Action Plan – Resolution

By Ms. Turner Sloos

No. 6765-23

A RESOLUTION

Authorizing the Submission of the 2024 Action Plan to the U.S. Department of Housing and Urban Development; Authorizing the Acceptance of Grant Awards Under Three Community Planning and Development Formula Programs from the U.S. Department of Housing and Urban Development on Behalf of the City of Dayton, and Declaring an Emergency.

WHEREAS, The City desires to increase the quality and quantity of decent housing, provide a suitable living environment, and secure expansion of economic opportunities for Dayton residents, particularly those of low- and moderate-income; and,

WHEREAS, The U.S. Department of Housing and Urban Development (HUD) has instituted the Consolidated Plan that serves as a framework to establish a comprehensive vision and strategy for housing and community development in the City and specifies how Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funding will be utilized to implement those strategies; and,

WHEREAS, Participating jurisdictions must annually submit to HUD an Action Plan, prepared in accordance with the requirements of 24 CFR Part 91, describing the activities the jurisdiction anticipates undertaking during the next year to address priority needs in terms of goals that are described in its five-year Consolidated Plan; and,

WHEREAS, The City of Dayton expects that its entitlement amount for fiscal year 2024 for the CDBG program will be approximately FIVE MILLION SEVEN HUNDRED EIGHT THOUSAND FIFTY-FIVE DOLLARS AND ZERO CENTS (\$5,708,055.00); and,

WHEREAS, The City of Dayton expects that its entitlement amount for fiscal year 2024 for the HOME program will be approximately ONE MILLION FIVE HUNDRED FIFTY-FIVE THOUSAND SEVEN DOLLARS AND ZERO CENTS (\$1,555,007.00); and,

WHEREAS, The City of Dayton expects that its entitlement amount for fiscal year 2024 for the ESG program will be approximately FIVE HUNDRED THIRTY-THREE THOUSAND SIX HUNDRED THIRTY-THREE DOLLARS AND ZERO CENTS (\$500,633.00); and,

WHEREAS, Public meetings have been held to obtain the view of citizens likely to be affected by the proposed community development housing activities and thereby provided such citizens an adequate opportunity to participate in the development of the plans; and,

WHEREAS, The 2024 Action Plan must be submitted to HUD November 17, 2023, and it is therefore necessary for the immediate protection of the public peace, health, safety and property that this resolution take effect on an early date; now, therefore,

BE IT RESOLVED BY THE COMMISSION OF THE CITY OF DAYTON:

Section 1. That the City Manager or her designee, he, and hereby is, authorized and directed on behalf of the City of Dayton to file a 2024 Action Plan with the U.S. Department of Housing and Urban Development, for the purposes of participation in the categorical grant programs sponsored by the Community Planning and Development Division of HUD, the FY 2024 CDBG Program in the amount of approximately FIVE MILLION SEVEN HUNDRED EIGHT THOUSAND FIFTY-FIVE DOLLARS AND ZERO CENTS (\$5,708,055.00), the HOME Program in the amount of approximately ONE MILLION FIVE HUNDRED FIFTY-FIVE THOUSAND SEVEN DOLLARS AND ZERO CENTS (\$1,555,007.00), and the ESG

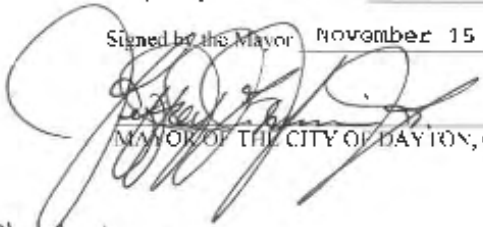
Program in the amount of approximately FIVE HUNDRED THOUSAND SIX HUNDRED THIRTY-THREE DOLLARS AND ZERO CENTS (\$500,633.00).

Section 2. That in the event HUD renders a grant to fund the Programs specified in Section 1 above, the City Manager or the designee is hereby authorized and directed to accept said grants on behalf of the City of Dayton, and to execute any necessary contracts or other documents in connection with the grants and the Programs.

Section 3. For the reasons stated in the preamble hereof, this Resolution is declared to be an emergency measure and shall take effect immediately upon its adoption.

Adopted by the Commission November 15, 2023

Signed by the Mayor November 15, 2023



MAYOR OF THE CITY OF DAYTON, OHIO

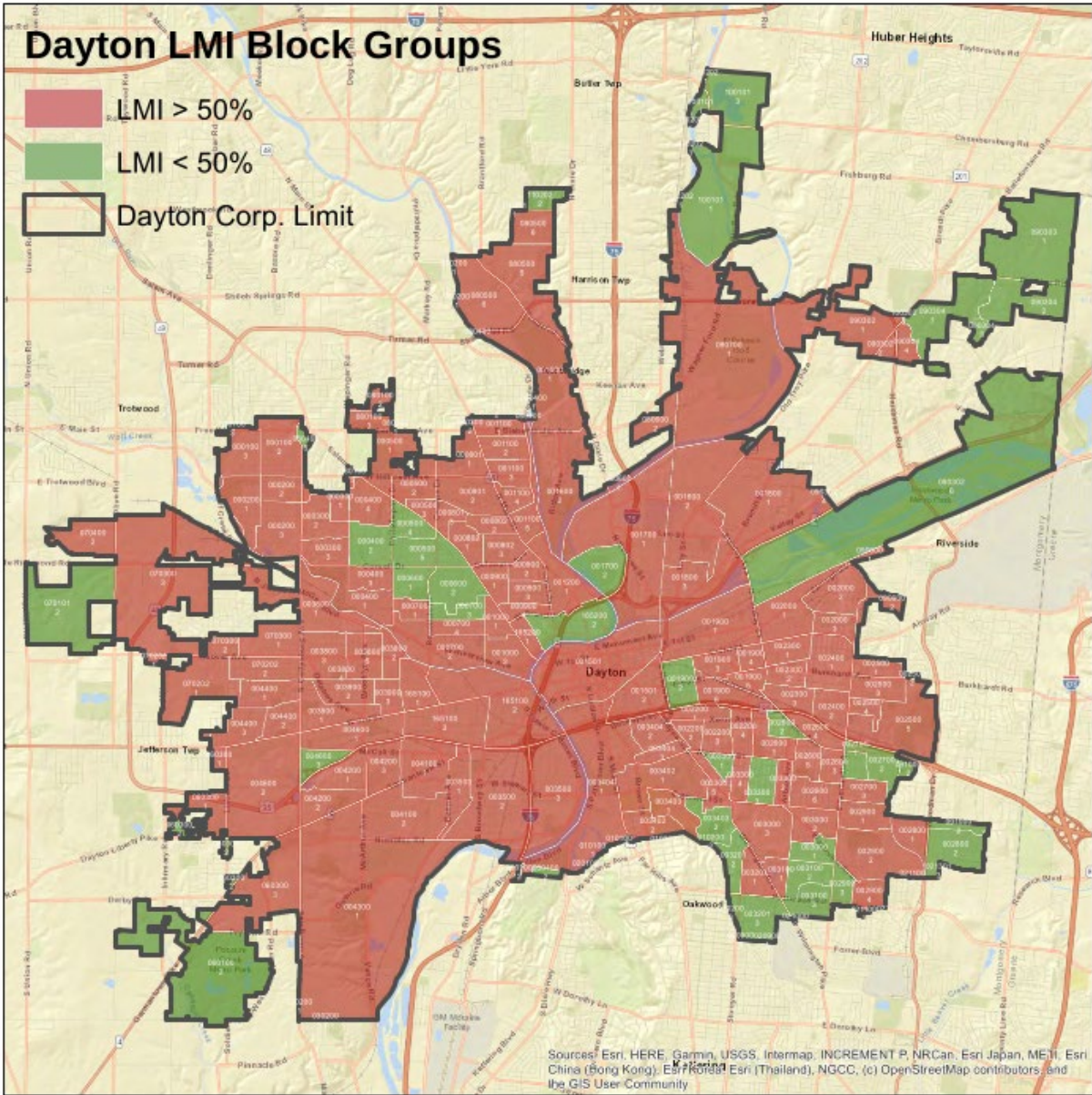
ATTEST:

Regina D Blackshear
Clerk of Commission

APPROVED AS TO FORM:

Jim Murrain
City Attorney

Map – LMI Block Groups



Citizen Participation Plan

CITY OF DAYTON PUBLIC PARTICIPATION PLAN

I. PURPOSE & INTENT

- A. The purpose of this Public Participation Plan is to provide for and encourage residents to participate in the development of the Consolidated Plan, Annual Action Plan, any substantial amendment to the Consolidated or Action Plan, and the Consolidated Annual Performance and Evaluation Report.
- B. The City of Dayton intends to encourage participation of all residents, including:
 - 1. Low- and moderate-income persons, particularly those living in slum and blighted areas and in areas where HUD funds are proposed to be used;
 - 2. Minorities and non-English speaking persons;
 - 3. Persons with disabilities;
 - 4. Local and regional institutions;
 - 5. Continuum of Care and other organizations that assist in the implementation of the Consolidated Plan;
 - 6. Public housing agencies and residents of public and assisted housing developments.
- C. The City of Dayton recognizes the importance of public participation and fully endorses a philosophy that maximizes public involvement through continual exploration of alternative techniques for optimal engagement.
- D. This Public Participation Plan meets the Citizen Participation and Consultation requirements for local jurisdictions and HOME consortia as defined in the Code of Federal Regulations in Sections 24 CFR Part 91.105, 24 CFR Part 91.401, and 24 CFR Part 91.100.

II. PROGRAM POLICY

It shall be the general policy under this plan to:

- A. Provide for and encourage public participation, with particular emphasis on participation by persons of low and moderate income;
- B. Provide residents with reasonable opportunity to comment on the Public Participation Plan, Consolidated Plan, Action Plan, any substantial amendment to such plans, and the Consolidated Annual Performance and Evaluation Report and to consider all comments and views received;
- C. Minimize the displacement of persons. In the unlikely event of any such displacement, the City of Dayton will adhere to the requirements set forth in 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;
- D. Provide for public hearings to obtain resident views and to respond to proposals and questions at all stages of the community development program, including the review of proposed activities and review of program performance. Hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for those with disabilities;

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- E. Provide residents, public agencies, and other interested parties with reasonable and timely access to local meetings, information, and records relating to the proposed use of funds;
- F. Provide for technical assistance to groups representative of persons of low- and moderate-income who request such assistance in developing proposals; and
- G. Provide for a timely written answer to written complaints and grievances.

III. TERMS & DEFINITIONS

Action Plan (AP)

The annual application that describes how the City will use its anticipated CDBG, HOME and ESG resources to implement the CP in a one-year time frame. The Action Plan also describes other actions that the City, its subrecipients, and other community partners will take to implement its Consolidated Plan.

Citizen Participation Plan (CPP)

The required plan that sets forth the City's policies and procedures for public participation in HUD programs. The adopted plan must be used when developing the Consolidated Plan, substantial amendment to the plan, and the Consolidated Annual Performance and Evaluation Report. The City of Dayton's required plan is referred to as the Public Participation Plan.

Community & Neighborhood Development Advisory Board (CNDAB)

An advisory board to the City Manager made up of residents, staff and community agencies. It is the official body for reviewing and making recommendations for the CDBG, ESG, and HOME programs.

Community Development Block Grant (CDBG)

A federally funded program administered by HUD whose primary objective is to principally benefit persons of low- and moderate-income by providing decent housing, a suitable living environment, and through expanding economic opportunities.

Consolidated Annual Performance and Evaluation Report (CAPER)

Reports the one-year progress and performance of the CDBG, HOME and ESG programs administered by the City and its Subrecipients.

Consolidated Plan (CP)

A three- or five-year comprehensive plan that describes the City's housing and community development needs and sets forth local strategies to address them. The Consolidated Plan must be submitted to HUD in order for the City to receive CDBG, HOME and ESG funds.

Emergency Solutions Grant (ESG)

A federally funded program administered by HUD whose objectives are to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

HOME Investment Partnership (HOME)

A federally funded program administered by HUD whose objectives are to provide decent, safe and affordable housing, alleviating the problems of excessive rent burdens, homelessness and deteriorating housing stock nationwide.

Low- to Moderate-Income (LMI)

Low- to moderate-income represents those whose income are at 80% or below the area median family income, as determined by HUD Section 8 limits, published annually.

U.S. Department of Housing and Urban Development (HUD)

The federal agency that oversees the use of CDBG, HOME, and ESG funds, approves the City's Consolidated Plan, Annual Action Plan, Consolidated Annual Performance and Evaluation Report (CAPER), and any amendments to the aforementioned items. HUD also is the agency that monitors the City for compliance with all applicable regulations.

IV. COMMUNITY & NEIGHBORHOOD DEVELOPMENT ADVISORY BOARD (CNDAB)

The CNDAB is established by the City Manager as an advisory board and public participation mechanism for HUD programs. The CNDAB participates in developing and reviewing proposals and suggestions for projects and activities for each program year. It provides a public voice to the process and assists the City in assuring that program information is made available to all concerned residents.

The primary purpose of CNDAB is to:

- A. Review and recommend priorities for the City's use of federal funds from HUD, for both operating and capital programs/projects. These HUD funds include, but are not limited to, CDBG, HOME and ESG.
- B. Review and recommend, based on the City's adopted Consolidated Plan, allocations and/or amendments of the City's CDBG, HOME and ESG federal entitlement dollars to the City Manager.
- C. The CNDAB is the focal point for the development and implementation of the Consolidated Plan and the Annual Action Plan. The board serves as a public review process providing guidance, reviewing and recommending policies and/or processes, making recommendations and advocating for the use of community resources.

The membership is made up of eighteen (18) members. There are ten (10) at-large members, two (2) of which must be of low- and moderate-income or represent agencies that serve low- and moderate-income populations; one (1) representative of Greater Dayton Premier Management; one (1) public or assisted housing resident; one (1) bilingual member who represents a non-English speaking minority population. There are four (4) City representatives, one member from each of the following offices: Department of Management and Budget; City Manager's Office; Planning and Community Development; and Public Works. There is one (1) Chairperson who serves as a non-voting member, with the exception of voting in the event of a tie. There are four (4) alternate representatives, three (3) of which are at-large alternates and one (1) must be an LMI alternate.

Nominations for board representatives are made by the Director of the Department of Planning and Community Development. The City Manager appoints members to the board for two- or three-year staggered terms.

All information and processes related to the Consolidated Plan, Action Plan, CAPER, allocation processes, and general policy and program issues concerning HUD's programs are brought before the CNDAB. Residents and stakeholders are welcome and encouraged to attend the CNDAB meetings, which are public meetings held - on the 2nd Monday of every month.

V. PUBLIC COMMENT

- A. The City of Dayton will provide a minimum of thirty (30) days to receive comments from the public on proposed consolidated plans, annual action plans, and substantial amendments to the Consolidated and Annual Action Plans.
- B. The City of Dayton will provide a minimum of fifteen (15) days to receive comments from the public on the Consolidated Annual Performance and Evaluation Report (CAPER).

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- C. All comments shall be submitted to:
 City of Dayton
 Department of Planning & Community Development
 101 West Third Street, 6th Floor
 Dayton, OH 45402
- D. All written comments received will be reviewed and maintained in the City's Public Participation File.
- E. **COVID-19 Waiver Update:** Per the U.S. Department of Housing and Urban Development Mega-Waiver released on March 31, 2020, the public comment period for Consolidated Plans, Annual Action Plans, and Substantial Amendments may be reduced to no less than five (5) days for the 2020 Program Year. The City of Dayton will utilize this waiver, and reduce public comment periods to five (5) days in length during the period of January 1, 2020, through December 31, 2020. The use of this waiver supersedes any comment periods established in Parts A-D of this section through December 31, 2020, or until amended, whichever occurs first.

VI. PUBLIC HEARINGS

- A. The City of Dayton will hold a minimum of two (2) public hearings per year to obtain residents' views and to respond to proposals and questions. The hearings will address housing and community development needs, development of proposed activities, and review of program performance.
- B. Public Hearing #1 will be held during the development of the Consolidated Plan or Annual Action Plan, prior to or during the public comment period. Information will include an overview of HUD programs, anticipated resources for the upcoming program year, proposed activities to be undertaken, including the estimated amount that will benefit persons of low- and moderate-income and other actions the City will be involved in to achieve the goals identified in the Consolidated Plan. All comments received will be summarized and included in the Consolidated and Annual Action Plans.
- C. Public Hearing #2 will be held during the development of the Consolidated Annual Performance and Evaluation Report, prior to or during the public comment period. Information will include program evaluation and performance, accomplishments and expenditures during the program year. All comments received will be summarized and included in the CAPER.
- D. The City will hold an additional public hearing for development of the Consolidated Plan outside City Hall in a community facility that is convenient and accessible for all residents. The public hearing will be held to obtain views of residents, public agencies, and other interested parties on identifying local housing and community development needs, issues and priorities. Further, comments and suggestions about strategies and activities to address needs will be encouraged, summarized and included in the Consolidated Plan.
- E. All public hearings will be advertised in a local newspaper of general circulation, through social media including the City's website, and notice given to the CNDAB. All notices shall be published, delivered or posted at least fifteen (15) calendar days prior to the date of the public hearing.
- F. All public hearings will be held at times and locations convenient to potential and actual beneficiaries, with suitable accommodation for persons with disabilities. The City of Dayton will also make every effort to accommodate non-English speaking residents who wish to participate in the public hearing. The City of Dayton will attempt, when contacted in advance, to locate and secure translators. In those instances when non-English speaking residents attend a meeting where no translator is present, the City is responsible for holding an additional meeting for the same purpose, with a translator present.

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G. COVID-19 Waiver Update: Per the U.S. Department of Housing and Urban Development Mega-Waiver released on March 31, 2020, the requirements to provide citizens with reasonable notice and opportunity to comment are waived and grantees are permitted to make their own determination on what constitutes reasonable notice and opportunity to comment. As stated in Section V., Part E., the public comment period has been modified to 5 days for the 2020 Program Year. To comply with Governor DeWine's Stay-At-Home and Safer-At-Home orders, the City of Dayton will hold public hearings in a virtual format. The City of Dayton will advertise public hearings on the City of Dayton's website and notice given to the CNDAB. All public notices will be delivered or posted at least seven (7) days prior to the date of the public hearing. The use of this waiver supersedes any public hearing requirements established in Parts A-F of this section through December 31, 2020, or until amended, whichever occurs first.

VII. CONSOLIDATED PLAN AND ANNUAL ACTION PLANS

- A. The City of Dayton will make available to residents, public agencies, and other interested parties information regarding the amount of assistance the City expects to receive (including HUD entitlement grant funds and program income), range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income, the City's plan to minimize the displacement of persons and to assist any persons displaced by housing activities, and any other relevant data that will assist in helping the public understand and participate in the program processes.
- B. The City will publish and otherwise make available the Consolidated Plan and Annual Action Plan in a manner that allows residents, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. The publication and availability efforts will include publishing a notice of availability and summary of the applicable document in a newspaper of general circulation; placing the summary document on the City's website and other social media; sending electronic copies (by request via e-mail); and providing a reasonable number of free copies to requesting agencies or individuals.
- C. The City will allow for a minimum 30-day review and comment period for the Consolidated Plan and Annual Action Plan. All comments received and views expressed will be considered, summarized, and included in the final Consolidated Plan and Annual Action Plan.
- D. COVID-19 Waiver Update:** Per the U.S. Department of Housing and Urban Development Mega-Waiver released on March 31, 2020, the public comment period for Consolidated Plans, Annual Action Plans, and Substantial Amendments may be reduced to no less than five (5) days for the 2020 Program Year. The City of Dayton will utilize this waiver, and reduce public comment periods to five (5) days in length during the period of January 1, 2020, through December 31, 2020. The use of this waiver supersedes any comment periods established in Parts A-C of this section through December 31, 2020, or until amended, whichever occurs first.

VIII. AMENDMENTS

- A. An amendment to the Consolidated Plan and/or Annual Action Plan caused by substantial changes in planned or actual activities will be determined by the following criteria:
 - 1. Any NEW or CANCELLED project;
 - 2. Any change which results in a CHANGE IN THE USE OF FUNDS from one eligible activity to another;
 - 3. 50% DECREASE OF IMPACT in the scope of a project, thereby reducing the amount of beneficiaries by 50% or more;

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- 4. A \$100,000 OR 10% INCREASE OR DECREASE IN FUNDING, whichever is greater, for a previously approved activity.
- B. The City will publish and otherwise make available the Amendment to the Consolidated Plan and Annual Action Plan in a manner that allows residents, public agencies and other interested parties a reasonable opportunity to review and submit comments. Amendments will be advertised in a local newspaper of general circulation, through social media including the City's website, and with notice given to the CNDAB.
- C. The City will allow for at least a 30-day review and comment period for Amendments to the Consolidated Plan and Annual Action Plan. All comments received and views expressed will be considered, summarized, and included in the Substantial Amendment to the Consolidated Plan and Annual Action Plan.
- D. **COVID-19 Waiver Update:** Per the U.S. Department of Housing and Urban Development Mega-Waiver released on March 31, 2020, the public comment period for Consolidated Plans, Annual Action Plans, and Substantial Amendments may be reduced to no less than five (5) days for the 2020 Program Year. The City of Dayton will utilize this waiver, and reduce public comment periods to five (5) days in length during the period of January 1, 2020, through December 31, 2020. The use of this waiver supersedes any comment periods established in Parts A-C of this section through December 31, 2020, or until amended, whichever occurs first.

IX. CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

- A. The City will publish and otherwise make available the Consolidated Annual Performance and Evaluation Report (CAPER) in a manner that allows residents, public agencies and other interested parties a reasonable opportunity to review and submit comments. Public notices regarding the opportunity to review and comment on the CAPER will be advertised in a local newspaper of general circulation, through social media including the City's website, and notice given to the CNDAB.
- B. The City will allow for at least a 15-day review and comment period for the Consolidated Annual Performance and Evaluation Report (CAPER). All comments received and views expressed will be considered, summarized and included in the CAPER.

X. AVAILABILITY AND ACCESS TO RECORDS

- A. The City will provide residents, public agencies, and other interested parties with reasonable and timely access to information and records relating to the HUD programs. The CAPER, adopted Consolidated Plan, Annual Action Plan, and any amendments will be made available to all interested residents. These documents will also be made available in a form accessible to persons with disabilities, upon request.
- B. Documents will be available at the following:
 - City of Dayton
 - Department of Planning & Community Development
 - 101 West Third Street, 6th Floor
 - Dayton, OH 45402
- C. The City of Dayton will maintain records for five (5) years following the close of the program year.

XI. COMPLAINT PROCEDURE

- A. Complaints or concerns regarding the City's program plans, policies, procedures, processes, documents or related questions may be written or phoned to:

City of Dayton
Department of Planning & Community Development
Division of Community Development
101 West Third Street, 6th Floor
Dayton, Ohio 45402
(937) 333-3670

A written response or acknowledgment of written complaints or concerns will be provided, as practical, within fifteen (15) working days.

- B. Persons wishing to object to the approval of the Consolidated Plan and/or Action Plan to HUD may make such objections known to the appropriate HUD area office. The HUD area office serving the City of Dayton is:

Community Planning and Development Division
U.S. Department of Housing and Urban Development, Ohio State Office
200 North High Street
Columbus, OH 43215-2499

Adopted: November 4, 2015 (Resolution No. 6148-15).

Amended: May 11, 2020.

This document supersedes and replaces in its entirety the "Citizen Participation Plan for the Department of Housing & Urban Development (HUD) Programs" adopted November 5, 2003, per Resolution Number 5297-03.

ESG Policies and Procedures



**City of Dayton, Division of Community Development
Emergency Solutions Grant
Policies and Procedures**

101 W. Third Street
Dayton, Ohio 45402

Created: 9/16/2020, as amended

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DEPARTMENT OF PLANNING, NEIGHBORHOODS AND DEVELOPMENT

City of Dayton
Dayton City Hall
101 W Third Street
6th Floor
Dayton, OH 45402

937-333-3670 main line
937-333-4261 fax
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Shelley Dickstein

PLANNING, NEIGHBORHOODS, AND DEVELOPMENT DIRECTOR
Steven Condol

Implementation of ESG Policies and Procedures

This document has been reviewed and approved for implementation by the City of Dayton Department of Planning and Community Development to guide the City of Dayton's compliance in the implementation, management, and oversight of annual ESG allocations, projects, and activities. To the best of the City's ability, this document has been updated to reflect the current policies, procedures, laws, and regulations governing the Emergency Solutions Grant program administered by the U.S. Department of Housing and Urban Development.

Division Manager Signature: _____ Date: _____

Department Director Signature: _____ Date: _____

Section 1: General Information

Purpose

This manual details the policies and operating procedures for the City of Dayton's Emergency Solutions Grant (ESG) Program. The manual and its contents are meant to work in conjunction with [ESG regulations](#) and shall not substitute or circumvent any existing regulations or reference materials. Information provided in this document may be updated due to changes in federal policy and regulations, internal City policies and preferences, and interpretation or clarification of federal regulations.

IDIS

The Integrated Disbursement and Information System (IDIS) is the online reporting system for HUD's CDBG, ESG, HOME, and HOPWA programs. This system is utilized by grantees and HUD to track and draw down Entitlement grant funding and program income, and to record the accomplishments and outcomes from Entitlement grant-funded activities. The City of Dayton uses IDIS to track, draw down, and report on the City's CDBG, HOME, and ESG programs. The City's policies and procedures pertaining to the use and management of IDIS in the ESG Program are interspersed throughout this document.

Program Description

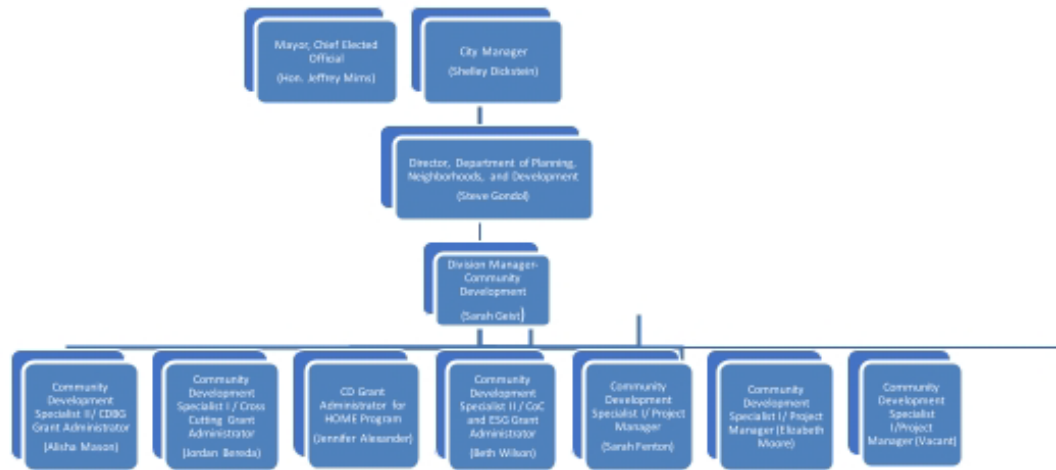
The Emergency Solutions Grants (ESG) Program was created when the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act was signed into law in 2009. The HEARTH Act amended and reauthorized the McKinney-Vento Homeless Assistance Act, and included major revisions to the existing Emergency Shelter Grant Program. See [24 CFR 576](#).

The new Emergency Solutions Grant Program is designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The change in the program's name reflects the change in the program's focus from addressing the needs of homeless in emergency or transitional shelters to assisting people to regain stability in permanent housing.

All funded agencies are required to follow federal guidelines (i.e. Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, aka "OMB Super Circular") found at [2 CFR 200](#) and Dayton-Kettering-Montgomery County Continuum of Care Coordinated Policies and Procedures in the implementation of the ESG program. Additionally, all agencies are required to follow City of Dayton (City) policies.

Community Development Organizational Chart and Staff Responsibilities

The Community Development Division is made up of eight key staff who oversee the management, compliance, and disbursement of the CDBG, ESG, CoC, and HOME programs from the U.S. Department of Housing and Urban Development. The organizational chart and overall responsibilities of the key staff are outlined below.



Division Manager – Community Development

The Division Manager – Community Development provides general oversight of all Community Development (CD) Division activity and staff. The CD Manager provides general oversight of all Community Development Division grant activity and manages all Community Development staff to ensure programs, projects, and activities are implemented and managed appropriately.

The CD Manager works closely with the Departments of Finance and Procurement, Management, and Budget to ensure that all grant funds are accounted for in the City's financial management system, Banner. The CD Manager ensures staff have all fund codes, activity codes, and budget line items necessary to fund projects and activities as well as continue grant administration activities.

The Division Manager has direct and administrative oversight of CDBG, HOME, and ESG grants. For these programs, the Division Manager of CD approves all invoices, ensures grant compliance, and ensures all Banner funds are established and reconciled annually. The CD Manager works closely with Grants Administrators and CD Specialists to ensure the day-to-day management of subrecipients and projects is compliant and operational. The CD Manager assists project managers in handling any issues that arise from project and subrecipient management. Additionally, the CD Manager helps CD staff navigate the CFR, HUD toolkits, and HUD CPD Notices to provide accurate and researched information.

For all 3 Entitlement Programs, the CD Manager provides guidance on City policy as it relates to ongoing activities, reviews and approves all legislation and agreements pertaining to the HUD Entitlement Programs for submission to the City Commission, reviews all policy updates and internal policy changes requested by CD staff, and works with grant administrators and CD Specialists to ensure compliance

with the requirement for the separation of duties associated with grant drawdown. The CD Manager ensures that the individual creating and requesting drawdown from IDIS is not approving their own draw requests. The CD Manager may generate/request or approve draws, based on the needed role, but may not provide both actions for the same voucher. The CD Manager is the primary contact in IDIS for all 3 grants, and is also in an admin role for the ESG portal SAGE.

The CD Manager has administrative oversight of the City's Continuum of Care (CoC) programs. Like the programs listed above, the CD Manager approves all invoices and works closely with the Grant Administrators and CD Specialists to ensure grant compliance. The CD Manager works directly with the Community Development Specialist overseeing the homelessness programs to administer the City's CoC grants. Within the e-LOCCS system, the CD Manager has the Approving Official role and is able to assist with drawdown and e-LOCCS management. Additionally, the Manager has access to the Continuum of Care's portal in SAGE.

The CD Manager has administrative oversight of Homelessness Grants, Lead and Healthy Homes grants, and other state and federal program funds or grant as they become available. Throughout the year, the Community Development Manager is responsible for the preparation, creation, dissemination, and submission of all Consolidated Planning documents related to HUD funding. This includes the Annual Action Plan, the 5-year Consolidated Plan, Action Plan Amendments, the Consolidated Annual Performance Evaluation Report (CAPER) and PR-26, and any corresponding documents. In conjunction with the Consolidated Planning documents, the Community Development Manager prepares and helps execute all grant agreements for HUD funding.

Along with these documents, the Community Development Manager creates the City's Resource Allocation Summary to track, monitor, and detail projects funded through each Annual Action Plan. These documents break down annual Entitlement allocations into the IDIS Projects and specific activities. As the Annual Action Plan progresses, the CD Manager updates the Resource Allocation Summary once Action Plans are amended or altered to reflect changes.

The CD Manager provides oversight and guidance on grant compliance. As the main point of contact with HUD, the CD Manager ensures that updated guidance, grant-based limits and regulations, and funding allocations are provided to CD staff in a timely manner. Community Development staff works closely with the CD Manager to escalate compliance issues, answer questions from subrecipients and contractors, and provide authorization and guidance on uncommon or complicated aspects of grants management.

During HUD monitorings, the CD Manager works in tandem with CD staff administering the monitored programs to provide all documentation and answers to HUD's requests in a timely manner.

Community Development Specialist II/ Community Development Grants Administrator for the CDBG Program

The CD Grants Administrator for the CDBG Program is responsible for the overall maintenance of the CDBG program, draws and financial management through IDIS, eligibility verification for all activities, maintenance of the CDBG portion of Consolidated Plan and Annual Action Plan documents and amendments, assistance with preparation of Grant Agreements, preparation of the Annual CAPER and PR-26, on-site monitorings of CDBG subrecipients, and evaluation of changes to Federal guidelines, requirements, and policies pertaining to the operation and management of the CDBG Program. The CD Grants Administrator for CDBG is the City's primary point of contact for HUD for the CDBG program.

On a monthly basis, the CD Grants Administrator for CDBG prepares a draw packet summarizing the funds that were disbursed through invoice processing and activity that has occurred within the City's financial management system Banner. This packet includes reconciliation for CDBG funds where activity occurred, based on active agreements and projects, and details the amount of expenditures, applicable credits, draws, program income, and transfers that occurred. The reconciliation includes information about the fund and activity numbers, fund balances, any necessary notations about the funds. Once generated, the CDBG Grant Administrator submits the reconciliations to the appropriate CDBG Project Manager for confirmation and signature.

Additionally, the packet includes a summary sheet detailing draw amounts and the Banner pay-in code for each activity, and a monthly financial report to assist the Finance Department in preparing the quarterly FFRs. After preparing and executing the fund reconciliations and preparing the summary and monthly financial report, the CDBG Grant Administrator then utilizes this packet to create the vouchers in IDIS for each IDIS Activity that needs to be drawn and add a signed and dated copy of each voucher to the packet. These packets are then submitted to the CD Division Manager so that draws can be approved in IDIS. Once an approved copy of the voucher is signed and dated, the full packet is organized by Banner fund then a copy of the final packet is submitted to the Department of Finance so that incoming ACH transfers from HUD can be assigned to the proper CDBG funds in Banner.

The CD Grants Administrator for the CDBG Program oversees the CDBG project management functions of other staff in the Community Development Division. Additionally, the CD Grant Administrator may provide project management to CDBG-funded activities as the assistance is needed.

Annually, the CD Grants Administrator for the CDBG Program is responsible for collecting all accomplishment data through the annual CDBG accomplishment reports and entering the data into the correct screens and datasets in IDIS. Once complete, the CD Grants Administrator also documents the completion date, confirmation of activity data, and actual completion steps for each activity in IDIS.

The CD Grant Administrator for the CDBG Program assists the Community Development Specialist II overseeing the ESG program. This is primarily done through approving draw requests in IDIS for ESG activities. Participation may also occur during on-site or desk monitorings of the ESG Program. If necessary, the CD Grant Administrator may join the Community Development Specialist II for file review and completion of monitoring checklists, on-site inspections, and/or responses to community complaints.

Community Development Specialist I/ Project Manager

The CD Specialist I position is responsible for the day-to-day management of subrecipient and development agreements for all three Entitlement Grants. As a CDBG Project Manager, the CD Specialist I is responsible for correspondence with subrecipients and beneficiaries (developers, owners, or sponsors), invoice processing, desk monitorings, beneficiary data collection, file upkeep and creation, and agreement generation and oversight. The position reports directly to the Community Development Manager. CDBG and HOME project management functions are overseen by the CD Grants Administrators for the CDBG and HOME Programs.

Community Development Specialist II/CoC and ESG Grant Administrator

Along with the Community Development Specialist I/ Project Manager, the Community Development Specialist II/CoC and ESG Grant Administrator acts as a project manager and grant administrator for the Continuum of Care (CoC) and Emergency Solutions Grant (ESG) grants. The Community Development

Specialist II/CoC and ESG Grant Administrator is responsible for management, compliance, and disbursement of the ESG and CoC grants. Daily tasks include correspondence with subrecipients, invoice processing, desk monitoring, beneficiary data monitoring, file maintenance and completion, and agreement generation and oversight. The position reports directly to the Community Development Manager.

Community Development Grants Administrator for the HOME Program

The CD Grants Administrator for the HOME Program is responsible for the overall maintenance of the HOME program, draws and financial management through IDIS, eligibility verification for all activities, maintenance of the HOME information for Consolidated Plan and Annual Action Plan documents and amendments, preparation of the Annual CAPER and PR-26, on-site monitorings of HOME subrecipients or developers, and evaluation of changes to Federal guidelines, requirements, and policies pertaining to the operation and management of the HOME Program. The CD Grants Administrator for HOME and the CD Manager are the City's primary point of contact for HUD for the HOME program.

On a monthly basis, the CD Grants Administrator for HOME prepares a draw packet summarizing the funds that were disbursed through invoice processing and activity that has occurred within the City's financial management system Banner. This packet includes reconciliation for HOME funds where activity occurred, based on active agreements and projects, and details the amount of expenditures, applicable credits, draws, program income, and transfers that occurred. The reconciliation includes information about the fund and activity numbers, fund balances, any necessary notations about the funds. Once generated, the HOME Grant Administrator submits the reconciliations to the appropriate HOME Project Manager for confirmation and signature.

Additionally, the packet includes a summary sheet detailing draw amounts and the Banner pay-in code for each activity, and a monthly financial report to assist the Finance Department in preparing the quarterly FFRs. After preparing and executing the fund reconciliations and preparing the summary and monthly financial report, the HOME Grant Administrator then utilizes this packet to create the vouchers in IDIS for each IDIS Activity that needs to be drawn and add a signed and dated copy of each voucher to the packet. These packets are then submitted to the CD Division Manager so that draws can be approved in IDIS. Once an approved copy of the voucher is signed and dated, the full packet is organized by Banner fund then a copy of the final packet is submitted to the Department of Finance so that incoming ACH transfers from HUD can be assigned to the proper HOME funds in Banner.

The CD Grants Administrator for the HOME Program oversees the HOME project management functions of other Community Development staff in the Community Development Division.

Additionally, in relation to the CDBG program, the Community Development Grants Administrator for the HOME Program may act as a project manager, specifically for CDBG housing programs. Daily tasks include correspondence with subrecipients, invoice processing, desk monitoring, beneficiary data monitoring, file maintenance and completion, and agreement generation and oversight.

Community Development Specialist I/ Cross-Cutting Requirements Grant Administrator

Along with the Community Development Specialist I/ Project Manager, The Community Development Specialist I/ Cross-Cutting Requirements Grant Administrator provides oversight of Environmental

Reviews (ER) and other cross-cutting requirements (BABA, Section 3, etc.) for the City's Entitlement Grant programs. This includes review and compliance of the City's ER process with current Federal regulations, proper publication and public notice, all environmental review steps, and submission of executed ER documentation to HUD for approval. Additionally, this role is the Section 3 Coordinator, BABA Coordinator, and oversees all other cross-cutting requirements for HUD grants.

Section 2: Program Intent

The City of Dayton Emergency Solutions Grant (ESG) utilizes federal funds to support local programs in assisting individuals and families to a) prevent homelessness b) quickly regain stability in permanent housing after experiencing a housing crisis or homelessness and c) improve the quality and quantity of emergency shelter services for the homeless. ESG funds are available for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and data collection through the Homeless Management Information System.

Release of Information

All information about the applicant/client is confidential. Disclosed information shall only be utilized for the purpose of determining program eligibility, providing benefits, or investigating possible violation of federal, state and local regulation(s) associated with ESG delivery. Disclose only appropriate information that is pertinent to the eligibility of the applicant will be disclosed, and exclude those items considered not pertinent to eligibility.

Access to information by inappropriate or unauthorized individuals or parties is a violation of the individuals' right to confidentiality. The City of Dayton and its subrecipients shall take care to secure all files so that unauthorized personnel do not have access to them.

Confidentiality

The City of Dayton shall ensure that all its officers, employees, subrecipients and agents are aware of and comply with this confidentiality requirement, along with the "Safeguarding Information for the Financial Assistance Programs" regulations as shown at 45 CFR §205.50.

Confidential records are all applications, records, files, and communications relating to applicants for, and clients of, services offered by ESG.

Subrecipients will keep confidential any information that the tenant submits in requesting an emergency transfer and any information about the emergency transfer, unless the tenant gives the housing program written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant.

The confidentiality policy standards maintained by the City shall comply with all applicable local, state and federal requirements. All records shall be maintained for a minimum of five years and shall be available

upon request for review to federal, state and county auditors and/or examiners in the course of their regular audits and monitoring functions of ESG.

Applicable Rules and Regulations

All the following as may be amended from time to time:

- 24 CFR 91 Consolidated Submissions for Community Planning & Development Programs
- 24 CFR 576 Emergency Solutions Grant Program
- 24 CFR 576.403 Shelter and housing standards
- 24 CFR 576.407 Other Federal requirements
- 24 CFR 576.408 Displacement, relocation, and acquisition
- 24 CFR 576.409 Protection for victims of domestic violence, dating violence, sexual assault, or stalking.

This manual provides guidelines for the ESG programs and as amended from time to time along with all other references made within this manual.

Waivers and Alternative Requirements for ESG-CV

Requirements at 24 CFR Part 576 and all applicable federal requirements apply to the use of ESG-CV, unless alternative requirements or flexibilities have been established in [Notice CPD-20-08: Waivers and Alternative Requirements for the Emergency Solutions Grants ESG Program Under the CARES Act](#) (ESG-CV Notice). As shown below, the alternative requirements and flexibilities provided in the ESG-CV Notice are applicable to annual ESG funding when those funds are used to prevent, prepare for, and respond to coronavirus and requirements in Section IV of the ESG-CV Notice are met.

This Section describes the statutes, regulations, waivers, and alternative requirements that apply to ESG-CV grants and certain activities funded with regular ESG funds.

The CARES Act (<https://www.govinfo.gov/app/details/PLAW-116publ136>) authorizes the Secretary to waive, or specify alternative requirements for, any provision of any statute or regulation that the Secretary administers in connection with the obligation by the Secretary or the use by the recipient of these amounts, except for requirements related to fair housing, nondiscrimination, labor standards, and the environment.

In accordance with 24 CFR 5.110, HUD may, upon a determination of good cause and subject to statutory limitations, waive regulatory provisions. Additional regulatory waiver authority is provided in 24 CFR 91.600. Regulatory waiver authority for the ESG grants is provided under the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Public Law 116-136. On March 31, 2020, CPD issued its first waivers of regulatory authority to help recipients prevent and mitigate the spread of COVID-19. On May 22, 2020, CPD issued its second set of waivers of regulatory authority to prevent and mitigate the spread of COVID-19.

[CPD Memo: Availability of Additional Waivers for Community Planning and Development \(CPD\) Grant Programs to Prevent the Spread of COVID-19 and Mitigate Economic Impacts Caused by COVID-19](#) published on 9/30/2020 includes additional waivers for the CoC, ESG, and YHDP Programs. Waivers and alternative requirements within the memorandum and the ESG-CV Notice of the ESG grants shall be

deemed to be effective as of the date a State or unit of local government began preparing for coronavirus, which HUD shall presume to be January 21, 2020 - the date the first confirmed case was reported in the United States.

However, each recipient must maintain adequate documentation to assure these waivers and alternative requirements are used only with respect to ESG- or ESG-CV-eligible activities the recipient or its subrecipients implemented to prevent, prepare for, and respond to coronavirus, including documentation demonstrating when their particular state or local government began preparing for coronavirus, such as notes on formal planning meetings or calls. Certain alternative requirements established by the ESG-CV Notice that limit activities in comparison with the requirements in 24 CFR 576 and the CARES Act are not retroactive.

Definitions.

Definitions from 24 CFR 576.2. For purposes of ESG-CV funds, the definitions at 24 CFR 576.2 apply, except that:

(1) At Risk of Homelessness. The CARES Act raised the income limit in paragraph (1)(i) of the “at risk of homelessness” definition at 24 CFR 576.2 from 30 percent of area median income to the Very Low-Income limit of the area, as determined by the Secretary. The entire definition of “at risk of homelessness,” incorporating the higher income limit for ESG-CV activities, is included below for reference.

At Risk of Homelessness means:

- i. An individual or family who:
 - a) Has an annual income that does not exceed the Very Low-Income Limit of the area, as established for HUD’s Section 8 and Public Housing programs at www.huduser.gov/portal/datasets/il.html;
 - b) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2; and
 - c) Meets one of the following conditions:
 - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - Is living in the home of another because of economic hardship;
 - Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.
- ii. A child or youth who does not qualify as "homeless" under 24 CFR 576.2, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
 - iii. A child or youth who does not qualify as "homeless" under 24 CFR 576.2, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth is living with her or him.

(2) Homeless (1) (iii): An individual may qualify as homeless under paragraph (1)(iii) the homeless definition in 24 CFR 576.2 so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. This waiver is in effect until March 31, 2021.

Definitions not in 24 CFR 576.2.

- i. The McKinney-Vento Act means the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq.).
- ii. Coronavirus means SARS-CoV-2 or another coronavirus with pandemic potential, as defined by section 23005 of the CARES Act.
- iii. ESG means, unless otherwise specified, the Emergency Solutions Grants Program whether funded through annual fiscal year (FY) appropriations or CARES Act funding. For example, a program participant assisted using only FY2020 ESG funding and a program participant assisted using only ESG-CV funding are both ESG program participants.
- iv. ESG-CV means the Emergency Solutions Grants Program as funded by the CARES Act and governed by requirements HUD establishes in accordance with that Act. ESG-CV funds do not include annual ESG funds (e.g., FY 2020 ESG grant funds), although annual ESG funds may be used in accordance with the requirements established for purposes of ESG-CV funds as further described in Section IV of the Notice.
- v. Temporary Emergency Shelter means any structure or portion of a structure, which is used for a limited period of time because of a crisis, such as a natural disaster or public health emergency, to provide shelter for individuals and families displaced from their normal place of residence or sheltered or unsheltered locations. Examples of temporary emergency shelters include:
 - a) An overnight, daytime, or 24-hour shelter in which program participants are only provided a safe place to sleep, rest, bathe, and eat;
 - b) a shelter where one or more services are made available on-site, whether by shelter staff or contractors or through a memorandum of understanding with another subrecipient or service provider; and

- c) a shelter designed to facilitate the movement of homeless individuals and families into permanent housing within a fixed period of time (e.g., within 12 months) and employs or contracts with one or more case managers or service providers to provide services as specified under sections III.E.3.a.(i)(e) and III.E.3.a.(ii)(e) through (h) of the ESG-CV Notice.
- vi. Prevent, Prepare for, and Respond to Coronavirus. To assist recipients in ensuring that an activity being paid for with ESG-CV funds is eligible, or determining whether annual ESG funding may follow the waivers and alternative requirements established in the ESG-CV Notice, recipients and subrecipients should consider the following:
 - a) Prevent coronavirus means an activity designed to prevent the initial or further spread of the virus to people experiencing homelessness, people at risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents. This includes providing Personal Protective Equipment to staff and program participants, paying for non-congregate shelter options such as hotels and motels, paying for handwashing stations and portable toilets for use by people living in unsheltered situations, and providing rapid re-housing or homelessness prevention assistance to individuals and families who are homeless or at risk of homelessness (as applicable) to reduce their risk of contracting or further spreading the virus.
 - b) Prepare for coronavirus means an activity carried out by a recipient or subrecipient prior to or during a coronavirus outbreak in their jurisdiction to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of disease. This includes updating written standards to prioritize people at severe risk of contracting coronavirus for shelter and housing consistent with fair housing and nondiscrimination requirements, adapting coordinated entry policies and procedures to account for social distancing measures or increased demand, developing a strategy and recruiting landlords to provide housing to people experiencing homelessness or at risk of homelessness, training homeless providers on infectious disease prevention and mitigation, and implementing a non-congregate shelter strategy to reduce the spread of coronavirus.
 - c) Respond to coronavirus means an activity carried out once coronavirus has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at risk of losing their housing as a result of the economic downturn caused by coronavirus. This includes transporting individuals and families experiencing homelessness to medical appointments, paying for shelter to isolate individuals who have contracted coronavirus from other program participants and people experiencing homelessness, providing rental assistance to those who are at risk of losing their housing, have already become homeless, or continue to experience homelessness due to the economic downturn caused by coronavirus, and providing hazard pay to recipient or subrecipient staff who put their own health at risk to continue to provide necessary services to individuals and families experiencing and risk of homelessness.

Temporary Emergency Shelters - The purpose of ESG-CV funds is to prevent, prepare for, and respond to COVID-19 in order to prevent and mitigate the spread of COVID-19 among people experiencing homelessness and the staff that provide services to these individuals. This requires that existing shelters implement public health protocols such as enforcing social distancing, establishing an isolation space (especially for residents suspected of having COVID-19, those with confirmed cases, and high-risk residents such as elderly people and people with pre-existing health conditions), using personal protective equipment (PPE), and cleaning/disinfecting shared and living spaces.

In many communities where existing shelter is not available or where current shelters are not able to implement these safety protocols, additional space may need to be identified to allow people to have shelter while staying as healthy as possible. This may be space within an existing shelter (e.g., an office not being used) that could be temporarily converted into a quarantine space for someone who has tested positive or is awaiting test results, or it could be an entirely separate building. Eligible shelter spaces may include public spaces, pop up or modular structures in compliance with U.S. Department of Housing and Urban Development (HUD) guidance.

If shelters utilize symptom screening as a part of intake procedures, it must be reviewed and approved by a local public health partner such as the county's or state's department of public health or the Healthcare for the Homeless partner. Shelters funded by ESG-CV must establish referral pathways to isolation and quarantine if a client is in need of such services. Shelters funded through ESG-CV will maintain social distancing requirements established in partnership with the county's or state's department of public health.

Shelters funded by ESG-CV may not turn away eligible program participants and must establish referral pathways to other shelter or housing if the shelter is at maximum capacity. Shelters must establish referral pathways to isolation and quarantine if a client is in need of such services. Someone who presents at an ESG-funded shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms. Shelters funded by ESG-CV are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection. Any ESG-funded shelter that is considering closing or not accepting new residents must immediately notify the local CoC, public health authority, and emergency management officials.

Landlord Incentives - The limitations on eligible activities under section 415(a) of the McKinney Vento Act and 24 CFR 576.105 are waived and alternative requirements are established to the extent necessary to authorize ESG-CV funds to be used under 24 CFR 576.105 to add the eligible cost of paying for landlord incentives as reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. However, a recipient may not use ESG-CV funds to pay the landlord incentives set forth below in an amount that exceeds three times the rent charged for the unit.

Waiving the limitation on eligible costs under housing relocation and stabilization services to pay for the costs of landlord incentives will increase the number of housing units available to people experiencing homelessness or at risk of homelessness, especially in tight rental markets and obtaining and maintaining housing is critical to preventing the spread of coronavirus and helping mitigate the economic impact of the crisis. The limitation to three times the rent charged for each unit ensures enough ESG-CV funds remain available to provide other eligible activities necessary to prevent the spread of coronavirus.

Eligible landlord incentive costs include:

- (i) Signing bonuses equal to up to 2 months of rent;
- (ii) Security deposits equal to up to 3 months of rent;
- (iii) Paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit; and,
- (iv) Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.

Volunteer Incentives - The limitations on eligible activities provided in section 415(a) of the McKinney-Vento Homeless Assistance Act and 24 CFR part 576, subpart B are waived and alternative requirements are established to the extent necessary to authorize ESG-CV funds to be used under 24 CFR 576.101(a), 24 CFR 576.102(a)(1), and 24 CFR 576.105(b) for cost of providing reasonable incentives to volunteers (e.g., cash or gift cards) who have been and are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak. Waiving this requirement to allow the payment of reasonable costs of volunteer incentives will increase the number of people available to provide the needed services and connections to housing to individuals and families experiencing homelessness to prevent the spread of coronavirus.

Short-Term and Medium-Term Rental Assistance –

- (i) 24 CFR 576.106(a)(2), where medium-rent is defined as “for more than 3 months but not more than 24 months of rent” is waived and an alternative requirement is established where medium-term is established as for more than 3 months but not more than 12 months. This alternative requirement will allow more households to receive rapid re-housing and homelessness prevention assistance, which is necessary to prevent, prepare for, and respond to coronavirus.
- (ii) The requirement at 24 CFR 576.106(d) that prohibits rental assistance where the rent for the unit exceeds the Fair Market Rent established by HUD, as provided under 24 CFR Part 888, is waived so long as the rent complies with HUD’s standards of rent reasonableness, as established under 24 CFR 982.507. Waiving this requirement will allow recipients to help program participants move quickly into housing or retain their existing housing, which is especially critical at reducing the spread of coronavirus and responding to coronavirus. This waiver provides additional flexibility beyond the waiver made available to the ESG Program on March 31, 2020 and extended to ESGCV funds on May 22, 2020 by permitting ESG recipients to provide rental assistance for program participants, whose current rent exceeds FMR and by allowing recipients to use this waiver as needed throughout the period they are providing rental assistance to prevent, prepare for, and respond to coronavirus.

Hotel/Motel Costs - As permitted under 24 CFR 576.102(a)(3), eligible costs include a hotel or motel voucher for homeless individuals and families where no appropriate emergency shelter is available. Additionally, the limitations on eligible activities provided in section 415(a) of the McKinney-Vento Act and 24 CFR part 576, subpart B are waived and alternative requirements are established to the extent necessary to authorize ESG-CV funds to be used for the following hotel or motel costs for individuals and families experiencing homelessness, receiving rapid re-housing assistance under the Continuum of Care (CoC) or ESG programs, receiving homelessness prevention under the ESG program, or residing in permanent supportive housing: The recipient or subrecipient may pay for a hotel or motel room directly or through a hotel or motel voucher. Additionally, funds can be used to pay for cleaning of hotel and motel rooms used by program participants as well as to repair damages caused by program participants above normal wear and tear of the room. These flexibilities are provided to allow recipients to secure hotel and motel rooms more quickly to be available when needed to prevent the spread of coronavirus (for example, when a program participant needs to isolate to keep from spreading the virus to other shelter occupants or household members).

Helping current ESG program participants maintain housing - In order to ensure current program participants receiving homelessness prevention and rapid re-housing assistance do not lose their

housing during the coronavirus public health crisis and the subsequent economic downturn caused by the crisis, the requirements in 24 CFR 576.105(c) and 576.106(a) are waived and alternative requirements are established as follows:

- i. The requirement at 24 CFR 576.105(c) limiting the total period of time for which any program participant may receive the services under paragraph (b) to 24 months during any 3-year period is waived solely for those program participants who reach their 24-month maximum assistance during the period beginning on the presumed start of this crisis, January 21, 2020 – the date the first confirmed case was reported in the United States, and ending 6 months from September 1, 2020, provided that the services are only extended for these program participants for up to a maximum of an additional 6 months; and
- ii. The requirement at 24 CFR 576.106(a) limiting the total number of months a program participant can receive rental assistance to 24 months in a 3-year period is waived solely for those program participants who reach their 24-month maximum during the period beginning on the presumed start of this crisis, January 21, 2020 – the date the first confirmed case was reported in the United States, and ending 6 months from September 1, 2020, provided that the rental assistance is only extended for these program participants for up to a maximum of an additional 6 months.

Means of carrying out grant activities - In general, the requirements at 24 CFR 576.202 apply, except that states and local governments may subgrant funds to public housing agencies and local redevelopment authorities.

Match Requirement – There is no match obligation requirement by the recipient or subrecipient.

Housing Stability Case Management - As required by 24 CFR 576.401(a) and (c), the recipient and its subrecipient must determine the available services and assistance that each ESG-CV program participant will need to achieve independent living and avoid further housing instability or homelessness, and the recipient and its subrecipient must assist each ESG-CV program participant, as needed, to obtain those services and assistance. However, HUD is making an across-the-board waiver of the ESG requirement in 24 CFR 576.401(e)(1) that housing stability case managers to meet not less than once per month with each program participant receiving homelessness prevention or rapid re-housing assistance. HUD is waiving this requirement for all program participants receiving this assistance after qualifying as homeless, in order to be consistent with the CARES Act prohibition stated in section III.F.10. Additionally, HUD is waiving the requirement for all program participants receiving assistance after qualifying as at risk of homelessness, in order to prevent the spread of coronavirus and reduce the barriers to providing the homelessness prevention that is necessary to respond to coronavirus.

Acronyms

Commonly used Acronyms Are:

AMI – Area Median Income

CE – Coordinated Entry

City – City of Dayton

CoC – Dayton-Kettering-Montgomery County Continuum of Care

DV – Domestic Violence

ESG – Emergency Solutions Grant

FMR – Fair Market Rent

HH – Household

HMIS – Homeless Management Information System

HQS – Housing Quality Standards
HUD – United States Department of Housing and Urban Development
IDIS – Integrated Disbursement and Information System
SRO – Single Room Occupancy
SSO – Subrecipient Shelter Organization
URA - Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970

Definitions

Americans with Disabilities Act (ADA) Compliance

The City of Dayton requires all ESG-funded shelters to comply with the ADA regulations. The ADA and Section 504 both stipulate that “no otherwise qualified person with disabilities shall, solely by reason of his or her disability, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity receiving federal financial assistance.” The Fair Housing Amendments Act regulations state “it shall be unlawful for any person to refuse to make reasonable accommodations in rules, policies, practices, or services, when such accommodations may be necessary to afford a person with a disability equal opportunity to use and enjoy a dwelling unit including public and private use areas.”

At-Risk of Homelessness:

Individuals and Families who:

1. Have an annual income below thirty percent (30%) of median family income for the area as determined by HUD; AND
2. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; AND
3. Meets one of the following conditions:
 - a. Has moved because of economic reasons two (2) or more times during the sixty (60) days immediately preceding the application for assistance homelessness prevention assistance; OR
 - b. Is living in the home of another because of economic hardship; OR
 - c. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
 - d. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
 - e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau; OR
 - f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); OR

- g. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the City's approved Consolidated Plan.

Continuum of Care

A Continuum of Care (CoC) is a regional or local planning body that coordinates housing and services funding for homeless families and individuals. The Dayton-Kettering-Montgomery County CoC oversees homeless benefits and services within the City of Dayton.

Homeless:

There are four categories of individuals/families who are "homeless" and therefore eligible for assistance through the ESG program:

1. Category 1: Literally Homeless

An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings including a car, park, abandoned building, bus or train station, airport, or camping ground;
- b. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); and
- c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

2. Category 2: Imminent Risk of Homelessness

An individual or family, who will imminently lose their primary nighttime residence, provided that:

- a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- b. No subsequent residence has been identified; and
- c. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based, or other social networks, needed to obtain other permanent housing.

3. Category 3: Homeless Under Other Federal Statutes (NOTE: CoC Program-funded projects are not authorized by HUD to serve this category)

Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- a. Are defined as homeless under section 387 of the Runaway and Homeless of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney Vento Homeless Assistance Act (42 U.S.C.11434a);

- b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- c. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- d. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

4. Category 4: Fleeing/Attempting to Flee Domestic Violence

Any individual or family who:

- a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- b. Has no other residence; and Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

Definition of Chronically Homeless

HEARTH/ McKinney Vento Act (24 CFR 91.5 and 24 CFR 578.3) defines Chronically Homeless as:

1. A homeless individual, who: Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 12 months or on at least 4 separate occasions in the last 3 years where the combined occasions must total at least 12 months.
 - a. "Occurrences" must be separated by a break of at least seven nights.
 - b. Stays in institution of fewer than 90 days do not constitute a break in homelessness; AND
 - c. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; OR
2. An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; OR
3. A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraphs (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

Domestic Violence (DV):

This definition includes domestic violence, dating violence, sexual assault, stalking, attempting to cause, or intentionally, knowingly or recklessly causing or placing another in fear of imminent serious physical injury or emotional, mental or verbal abuse, and using coercive or controlling behavior. This does not include other criminal acts such as violence perpetrated by a stranger, neighbor, acquaintance or friend, unless those persons are family members, intimate partners or household members.

Emergency Shelter:

"Emergency shelter," means any facility whose purpose is to provide temporary shelter for the homeless including congregate shelters, hotels/motels paid for by charitable organizations, or federal, state and/or local government programs, which do not require occupants to sign leases or occupancy agreements. Shelters that receive funding under the Emergency Shelter activities shall comply with these policies and procedures and all ESG regulations as they may be amended.

ESG Objectives:

The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly rehouse homeless individuals and families; and (6) prevent families/individuals from becoming homeless.

HMIS:

Homeless Management Information System - Local information technology system used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness. Each Continuum of Care (CoC) is responsible for selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards.

Projects funded under ESG where the subrecipient is a victim services provider may not enter client-level data into an HMIS; instead, they must use a comparable database to collect client-level data over time and generate unduplicated aggregate reports based on that data.

Other Federal Statutes:

Other Federal Statutes include:

- Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.),
- Head Start Act (42 U.S.C. 9831 et seq.),
- Subtitle N of the Violence against Women Act of 1994 (42 U.S.C. 14043e et seq.) (VAWA),
- Section 330 of the Public Health Service Act (42 U.S.C. 254b),
- Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.),
- Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), and
- Subtitle B of title VII of the McKinney-Vento Act (42 U.S.C. 11431 et seq.)

Street Outreach:

"Street outreach" means essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, transportation, and services for special populations.

Subrecipient:

Subrecipients are private not-for-profit organizations, public housing agencies or local redevelopment authorities that, by subgrant with the City, provide ESG direct client services and receive funding from the City for said services. Under its agreements with the City, Subrecipients will provide eligible street outreach, essential services and/or emergency shelter operations as the City may approve while complying with all requirements of the Emergency Solutions Grant. The Subrecipient agreement shall reference and enforce these policies and procedures and all federal requirements, as they may be amended.

Support Network:

Examples include family, friends and faith-based or other social networks, both private nonprofit organizations such as Subrecipients and conventional organizations such as social services and emergency medical assistance.

Unaccompanied Youth:

Unaccompanied Youth are less than twenty-five (25) years of age and homeless under other Federal statutes and:

1. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the sixty (60) days prior to the homeless assistance application; AND
2. Have experienced persistent instability as measured by two moves or more in the preceding sixty (60) days; AND
3. Can be expected to continue in such status for an extended period due to special needs or barriers.

Section 3: Eligible Activities

ESG grant funding can be used for five categories; HMIS, Street Outreach, Emergency Shelter, Rapid Re-housing, Homelessness Prevention Services and eligible Administration Costs.

- Program participants are not to be removed from ESG-funded programs and activities unless the subrecipient can demonstrate improved and/or steady household income necessary to ensure household stability or terminate in accordance with the formal process established by the Continuum of Care Written Procedures. See Dayton-Kettering-Montgomery County OH-505 Continuum of Care Coordinated Entry Policies and Procedures in Appendix A.

Homelessness Prevention Services

Homelessness Prevention Services are housing relocation and stabilization services and short and /or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or place not designed for human habitation Homelessness prevention must be provided in accordance with housing relocation/stabilization requirements, short- and/or medium-term rental assistance requirements, and written standards and procedures established under 24 CFR 576.400, as amended.

Homelessness prevention services are most effectively implemented when targeted to those at the greatest risk of losing housing. Households should demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under category 1 of the homeless definition.

Enrollment in a prevention program typically lasts around 2-6 months, although enrollments can be longer. ESG subrecipients should negotiate with landlords as the first step in resolving eviction crises. Providers should focus on a case management plan to ensure long-term stability for program participants. Providers are expected to implement a case management plan that will increase household incomes and/or increase access to mainstream benefits for program participants.

Eligible Costs

- Short-term rental assistance (3 months)
- Medium-term rental assistance (4-24 months)
- Housing search and placement
- Housing stability case management
- Rental arrearages (up to 6 months)
- Security and Utility deposits (for new units only)
- Utility deposits or arrearages
- Other related one-time or short-term expenses to assist in maintaining housing

Eligible Program Participants

Individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD.

Risk factors that make finding and maintaining housing more challenging should be used to screen people into assistance rather than screening them out.

Rapid Re-Housing Assistance

Rapid Re-Housing Assistance is housing relocation and stabilization services and short and/or medium-term rental assistance necessary to help an individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Rapid re-housing must be provided in accordance with housing relocation/stabilization requirements, short- and/or medium-term rental assistance requirements, and written standards and procedures established under 24 CFR 576.400, as amended.

Eligible Costs

- Rental Assistance: rental assistance and rental arrears
- Financial Assistance: rental application fees, security and utility deposits, utility payments, last month’s rent, moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

Eligible Program Participants

Individuals and families who meet the criteria under paragraph (1) of the "homeless" definition in 24 CFR 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition and live in an emergency shelter or other place described in paragraph (1) of the "homeless" definition.

Housing Relocation and Stabilization Services

Rapid re-housing and homelessness prevention services may include, at the City's discretion, rent application fees, security and utility deposits, last month rent, utility payments, moving cost, housing search and placement, case management, mediation, legal services, credit repair, short-term or medium-term housing tenant based rental assistance, rent in arrears and/or costs associated with HMIS requirements.

Per CoC Coordinated Entry Policies and Procedures, rapid re-housing participants will be able to maintain housing with short (1-3 months) to moderate (4-24 months) assistance. Programs should assume households, even with zero income or other barriers, will succeed in housing with the right supports. Households with higher housing barriers or no income may need assistance for different depths or durations, but such households should still be assisted in immediately attaining permanent housing and increasing income to pay fair market rent.

Use with other subsidies:

Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

Rental Assistance Requirements and Restrictions

Provides program participants with up to three (3) months of short-term rental assistance or up to twenty-four (24) months of moderate rental assistance. Rental assistance must be tenant-based assistance.

1. Tenant-based Rental Assistance

A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.

- a. The City requires that all program participants secure housing within the City for the period in which the rental assistance is provided.
- b. The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:
 - i. The program participant moves out of the housing unit for which the program participant has a lease;
 - ii. The lease terminates and is not renewed; or
 - iii. The program participant becomes ineligible to receive ESG rental assistance.
 - iv. Project-based rental assistance is received by the participant from other sources.

2. Tenant based Rental Assistance Requirements:

- a. Must meet compliance with Habitability Standards
- b. Must meet compliance with Fair Market Rent (FMR)
 - i. Assisted units must be at or below FMR, for area and unit size, for rent plus utilities.
 - ii. See "Fair Market Rent and Rent Reasonableness" section in this manual.

3. Rental Assistance Agreement and Lease Standard

- a. The rental assistance agreement must set forth the terms under which rental assistance will be provided. See "Lease Agreement" section in this manual.
- b. Each participant receiving rental assistance must have a legally binding, written lease, between the owner and participant, for the rental unit, unless, the assistance is solely for rental arrears.

4. Cannot use with other Subsidies

- a. No rental assistance can be provided to household receiving rental assistance from another public source for the same time period, except for six (6) months of arrears.
- b. Rental assistance may not be provided to participants who are currently receiving replacement housing payments under the URA (Example: Persons living in public housing units, using housing choice vouchers, or residing in project-based assisted units cannot receive monthly rental assistance under ESG).

5. Late Payments

- a. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
- b. The City must make timely payments to owners in accordance with the rental assistance agreement.
- c. The City is not responsible for paying late payment penalties that the tenant incurs on their own behalf.

Emergency Shelter

Provides subrecipients, which operate an eligible emergency shelter, funding for repairs and renovations of shelter facilities and/or operations and maintenance of shelter facilities to increase their quality and quantity available for the homeless. Shelter funding includes shelter operations and shelter essential services (i.e case management).

Eligible Costs

Shelter Operations

To receive funding for operations a shelter must meet the definition herein, and comply with all appropriate ESG regulations for habitability, case eligibility, health and safety and shelter operations related to the ESG program. Activities related to Shelter Operation may include, at the City's discretion, and subject to the Subrecipient award agreement, maintenance, fuel, security, rent, food, furnishings, equipment, insurance, utilities and/or supplies needed for operation of the approved shelter. Essential

services for general operations may include salaries and expenses for case management, childcare, education, employment assistance, legal services, life skills training, mental health services, outpatient health services, substance abuse treatment, transportation, services for special populations and related ESG eligible operation expenses.

Shelter renovations and Repair

The City may, at its discretion, make available funding for renovation of eligible shelter facilities. New construction is not eligible. Renovation and repair of shelter facilities may include labor, materials, tools and related construction costs for health and safety, code and housing quality standards. A scope of work must be included in any funding request, with a summary description and list of activities and cost estimate, from a qualified contractor or professional. Justification for each activity as it relates to health and safety, code, housing quality standards and the ESG shall be provided by the prospective applicant shelter operator/Subrecipient.

Eligible Program Participants

Individuals and families who are literally homeless residing in an emergency shelter.

Street Outreach

ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. In general, the City shall rely on community-based organizations and subrecipients for street outreach, where funded by the City.

Eligible Costs

Limited to those necessary to provide emergency care on the street or in parks, abandoned buildings, bus stations, campgrounds, and other places where unsheltered people are staying. Staff salaries to carry out activities are allowable, plus other essential services such as engagement, case management, emergency health services, emergency mental health services, and transportation

Eligible Program Participants

Individuals and families who are literally homeless in areas not meant for human habitation.

Administration

While general management and oversight of the ESG program by the City is an eligible cost to utilize ESG funds, it is the City of Dayton's policy that costs for general management and oversight be taken from CDBG funds.

Eligible Costs

- Salaries, wages, and related costs for grantee staff whose primary responsibilities involve program administration, developing systems for ensuring compliance with program requirements, preparing reports and other documents related to the Homeless Assistance Program, performance of financial management responsibilities related to the grant and coordinating the resolution of audit and/or monitoring findings;
- Administrative services performed under third party contracts or agreements such as accounting services and audit services; and

Preparation of Consolidated Plan Activities.

ESG Program Ineligible Activities and Costs:

ESG funds cannot be used for the following:

- a. Continuum of Care coordinating expenses;
- b. Pay for foreclosure prevention;
- c. Pay rental assistance for rent to own/lease to purchase;
- d. Provide rental assistance to help those on Section 8 (excluding utility if used to help the program participant regain stability in his/her current permanent housing or move into other permanent housing and achieve stability in that housing);
- e. Provide assistance (pay security deposits and/or utility deposits etc.) to those living in subsidized housing with the exception for a new voucher holder;
- f. Assist a household with their rent if they have a project-based voucher;
- g. Set aside money for individual(s) who may be at risk of losing their job;
- h. Assist the homeless or those at risk of becoming homeless to expunge and/or pardon their criminal records or for re-entry advocacy to help ex-offenders get jobs (Legal services costs are eligible to pay for matters that interfere with the program participant's ability to obtain and retain housing);
- i. Pay rent bills from a previous address (One-time payment of rental arrears is eligible);
- j. Mortgage payments or mortgage refinancing costs to make housing affordable;
- k. Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state or local housing subsidy program;
- l. Motel/hotel Vouchers (Eligible costs as overflow beds for emergency shelters);
- m. Pet fee imposed by the landlord;
- n. Credit card bills or other consumer debt (ESG funds may be used to pay for a credit card transaction fee charged when making a utility payment as long as the utility payment enables the eligible program participant to remain housed or become re-housed);
- o. Car repair for program participants;
- p. Regular non-emergency medical or dental care not covered under 24 CFR 576.102(1)(v) and 24 CFR 576.101(a)(3);
- q. Entertainment activities;
- r. Cash assistance to program participants;
- s. Development of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons. However, persons who are being imminently discharged into homelessness from such public funded institutions are eligible to receive financial assistance through ESG. Participants who are homeless or at risk of homelessness eligibility criteria as condition of eligible cost; or
- t. Payment of licenses, certifications, and general classes (classes not specifically related to these funds);

Section 4: Program Basics

Eligibility to receive assistance under all ESG programs will be based on the guidelines outlined by HUD, initially by determining if the individual or family qualifies as "homeless" as defined in the HEARTH Act of 2009, SEC. 103, or at-risk of homelessness. Evaluation and eligibility policies and procedures are

developed in accordance with the centralized or coordinated assessment requirements set forth under 24 CFR §576.400(d). See Appendix A for Dayton-Kettering-Montgomery County OH-505 Continuum of Care Coordinated Entry Policies and Procedures

Intake

The Subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under § 576.400(d) and the written standards established under § 576.400(e). See Appendix A for Dayton-Kettering-Montgomery County OH-505 Continuum of Care Coordinated Entry Policies and Procedures

Intake best Practices

- DO complete either the CoC approved Intake form or comparable City/Subrecipient approved intake form completely. See Appendix ?? for forms. The Intake form will collect demographic data and help determine which programs the participant is eligible for.
- DON'T ask for extraneous information and be mindful of participants' privacy and potential past traumas (i.e. only ask information that is necessary for services/housing to be rendered).
- Participants have the right to refuse to answer questions on an intake/discharge form or refuse to have their data entered into HMIS and/or comparable database.

Effective Communication

All CoC programs must take steps to ensure effective communication with individuals with disabilities, providing auxiliary aids and services necessary to ensure effective communication (e.g. Braille, audio, large type, assistive listening devices, and sign language interpreters) as described in HUD Notice, 24 CFR Part 576, and 42 U.S.C. 11371, et seq., HUD Notice CPD 17.

Providers will take reasonable steps to ensure the Coordinated Entry(CE) process can be accessed by persons with Limited English Proficiency (LEP) as stated in HUD's Final Guidance to Federal Financial Assistance to Recipients: Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732).

Households in need of language interpreters can access such services via Community Services for the Deaf, Deaf Community Resource Center, and CSD Ohio Relay, which CE staff will help coordinate.

Households with limited literacy skills may have rules or information pertaining to services, housing opportunities, and CE read aloud to them to ensure they have a full understanding.

Program Requirements for Homelessness Prevention (HP) & Rapid Re-housing (RRH)

The City and/or subrecipient receiving RRH/HP funds shall be subject to all of the requirements that apply to the grantee under the HUD ESG Program Interim Regulations (24 CFR 576).

Literally Homeless Requirement for RRH

To receive ESG rapid re-housing (ESG-RRH) assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (referred to as Category 1 in the Homeless Definition Final Rule). An individual or family is defined as "literally homeless" if;

1. Living in a public or private place not meant for human habitation,
2. Living in temporary shelter, which includes congregate shelters and transitional housing, or
3. Exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution.

Calculating Income

When determining the annual income of an individual or family, the recipient or subrecipient must use the standard for calculating annual income under 24 CFR 5.609.

Homelessness Prevention Income Requirements

The ESG Program interim rule limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake and incomes that do not exceed 30 percent of AMI at reassessment, which must take place not less than once every 3 months. Income must be calculated at the time of application and every three (3) months thereafter as part of the re-certification process for individuals or families receiving Homelessness Prevention. Income calculations must be documented in the client file.

Rapid Re-Housing Income Requirements

Program participants receiving ESG RRH assistance do not require an income assessment at initial evaluation. At re-evaluation - which must take place not less than once annually, the participant's household must have an annual income that does not exceed 30 percent of median family income for the area, as determined by HUD.

RRH/HP Requirements for All Program Applicants

Subrecipients shall:

- Assess every program applicant for risk of entering shelter (HP) or verification of their current stay in shelter/on the street (RRH).
- Use a clear documented process to determine the type, level, and duration of assistance for each program participant, in compliance with the CoC's written standards. See Appendix A for Dayton-Kettering-Montgomery County OH-505 Continuum of Care Coordinated Entry Policies and Procedures
- Re-evaluate eligibility at least once every 3 months for all program participants receiving rental assistance for Homelessness Prevention assistance and every 12 months for Rapid Re-housing assistance. Provide case management or support services, as needed, to all program participants receiving assistance in order to transition them to independence.
- Adhere to all data collection and reporting requirements.

Participation in Support Services

Support services cannot be mandated for individual(s) receiving ESG assistance.

Households who are income eligible but fail to make an effort to find employment, secure income, apply for other rental assistance programs, etc., although they demonstrated the ability to sustain housing at the time of entry, cannot have their assistance terminated based on these criteria.

- Per 24 CFR 576.401(b), The subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. At a minimum, each re-evaluation of eligibility must establish that: The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Case Management

Subrecipients are expected to provide case management services to all ESG program participants including connecting program participants to mainstream and other resources including:

- Referrals to appropriate supportive services including obtaining permanent housing, health treatment, mental health treatment, vocational and educational training, and other services essential for achieving independent living; AND
- Other Federal, State, local and private assistance available to support program participants in obtaining housing stability including:
 - Medicaid
 - Supplemental Nutrition Assistance Program
 - Women, Infants and Children (WIC)
 - Federal/State Unemployment Insurance
 - Social Security Disability Insurance,
 - Supplemental Security Income
 - Child and Adult Care Food Programs
 - Other resources that assist program participants in obtaining income and other benefits.

Section 5: Continuum of Care (COC) & Service Coordination Requirements

The City and/or subrecipients must document its compliance with the requirements of 24 CFR 576.400 for consulting with the Continuum of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.

Consultation with Continuums of Care

The City and subrecipients must consult with the Continuum of Care to determine how to allocate ESG funds each program year; developing the performance standards for, and evaluating the outcomes of,

projects and activities assisted by ESG funds; and developing funding, policies, and procedures for the administration and operation of the HMIS.

Coordination with other targeted homeless services

The City and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the CoC or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs may coordinate with those programs that are offered in the City:

1. Shelter Plus Care Program (24 CFR part 582);
2. Supportive Housing Program (24 CFR part 583);
3. Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
4. HUD—Veterans Affairs Supportive Housing (HUD-VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110-161 (2007), 73 FR 25026 (May 6, 2008)); as available
5. Education for Homeless Children and Youth Grants for State and Local Activities (title VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.));
6. Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act (42 U.S.C. 290aa-5);
7. Healthcare for the Homeless (42 CFR part 51c);
8. Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.));
9. Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc-21 et seq.));
10. Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
11. Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 et seq.));
12. Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
13. Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
14. Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
15. VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);
16. Health Care for Homeless Veterans Program (38 U.S.C. 2031); xvii. Homeless Veterans Dental Program (38 U.S.C. 2062);
17. Supportive Services for Veteran Families Program (38 CFR part 62); and
18. Veteran Justice Outreach Initiative (38 U.S.C. 2031).

System and program coordination with mainstream resources

The City and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:

1. Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
2. Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
3. Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891);
4. HOME Investment Partnerships Program (24 CFR part 92);
5. Temporary Assistance for Needy Families (TANF) (45 CFR parts 260-265);
6. Health Center Program (42 CFR part 51c);
7. State Children's Health Insurance Program (42 CFR part 457);
8. Head Start (45 CFR chapter XIII, subchapter B);
9. Mental Health and Substance Abuse Block Grants (45 CFR part 96); and
10. Services funded under the Workforce Investment Act (29 U.S.C. 2801 et seq.)

Centralized or coordinated assessment

The city, and subrecipients must participate in the Coordinated Entry process to improve the delivery of housing and shelter services to those who are homeless or at great risk of homelessness. The City and its subrecipients must work with the CoC to ensure the screening, assessment and referral of program participants are consistent with the written standards required by 24 CFR 576.400(e). A domestic violence provider may choose not to use the Continuum of Care's centralized or coordinated assessment system. See [HUD Notice CPD 17-01, Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System.](#)

Participation in HMIS

ESG requires participation in HMIS, or a comparable database, and must follow all state and federal laws governing HMIS, including:

1. Collecting informed written consent from program participants. NOTE- written consent not required if referenced in Privacy Notice to collect and share data and given to the program participant. Program participants should be given a Privacy Notice in all circumstances to make data collection transparent. A plain language statement should be used like the following:
 "We collect personal information directly from you for reasons that are discussed in our Privacy Notice. We may be required to collect some personal information by law or by organizations that give us money to operate this program. The personal information we collect is important to run our programs, to improve services for persons experiencing homelessness, and to better understand the needs of persons experiencing homelessness. We only collect information that we consider to be appropriate."
2. Not denying service based solely on program participant refusal to provide data to an HMIS,
3. Protecting program participant confidentiality,
4. Not collecting, in HMIS, personally identifying information from program participants that are victims of domestic violence; however, use of another comparable database is acceptable,
5. Using the HMIS as a tool to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
6. Conducting the initial evaluation through HMIS, including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;

7. Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
8. Monitoring and evaluating program participant progress;
9. Providing information and referrals to other providers within HMIS guidelines;
10. Developing an individualized housing and service plan, including planning a path to permanent housing stability;
11. Conducting re-evaluations required through HMIS, and

Homeless Participation

Subrecipients must document its compliance with the homeless participation requirements under 24 CFR 576.405(c). The subrecipient must provide avenues for homeless participation in programs supported by ESG fund via the following:

- a. To the maximum extent practicable, the City or subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

Conditions for Religious Organizations

Subrecipients must document their compliance with the faith-based activities requirements under 24 CFR 576.406 and will not utilize ESG funds for inherently religious activities prohibited in the federal statute, such as worship, religious instruction or proselytization.

Section 6: Documentation (Intake Documentation)

Subrecipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.

These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under § 576.400(d) and the written standards established under § 576.400(e).

HUD Universal Data Elements

<i>Required of ALL ESG Programs</i>	
Name	Project Entry Date
Social Security Number	Project Exit Date
Date of Birth	Destination
Race	Relationship to Head of Household
Ethnicity	Client Location
Gender	Housing Move-In Date
Veteran Status	Living Situation
Disabling Condition	

Housing Status Documentation Options by Program

Program Component	Documentation of prior Residence Required at Intake	Documentation Options (must select one)
Emergency Shelter Operations	Yes	Self-Certification or HMIS Record
Street Outreach	No	N/A
Rapid Rehousing	Yes	See next chart for documentation options
Homeless Prevention	Yes	See next chart for documentation options

Documentation Options: Homeless/At-Risk

(See 24 CFR 576.500(b))

<p>Literally Homeless</p> <p>See 24 CFR 576.500(b)(1) and 24 CFR 576.500(b)(2)</p>	<ul style="list-style-type: none"> • Written observation by the outreach worker; or • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution—one of the forms of evidence above and discharge paperwork or written/oral referral, or • written record of intake worker’s due diligence to obtain above evidence and certification by individual that they or exiting or have exited institution
<p>Imminent Risk of Homelessness</p> <p>See 24 CFR 576.500(b)(3)</p>	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave in 14 days; or • For individual and families leaving a hotel or motel—evidence that they lack the financial resources to remain for 14 days; or • A documented and verified oral statement; and • Certification that no subsequent residence has been identified; and • Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing
<p>Homeless under other Federal statutes</p> <p>See 24 CFR 576.500(b)(4)</p>	<ul style="list-style-type: none"> • Certification by the City or nonprofit that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; and • Certification of no PH in last 60 days; and • Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and • Documentation of special needs or 2 or more barriers
<p>Fleeing or Attempting to Flee DV</p> <p>See 24 CFR 576.500(b)(5)</p>	<p>For victim service ESG programs:</p> <ul style="list-style-type: none"> • An oral statement by the individual or head of household seeking assistance, which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker <p>For non-victim service ESG programs:</p>

	<ul style="list-style-type: none"> • Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and • Certification by the individual or head of household at no subsequent residence has been identified; and • Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing
<p>At Risk of Homelessness – Individuals and Families</p> <p>See 24 CFR 576.500(c)(1)</p>	<p>For each individual or family who ESG homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the subrecipient. The evidence must also include:</p> <ol style="list-style-type: none"> 1. If the program participant meets the criteria under paragraph (1) of the "at risk of homelessness" definition in § 576.2: <ul style="list-style-type: none"> • The documentation for determining annual income • The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in § 576.2 • The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition. Acceptable evidence includes: <ul style="list-style-type: none"> ○ Source documents (e.g., notice of termination from employment, unemployment compensation statement,

	<p>bank statement, health-care bill showing arrears, utility bill showing arrears);</p> <ul style="list-style-type: none"> ○ To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in § 576.2; or ○ To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; and <ul style="list-style-type: none"> • The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in § 576.2. Acceptable evidence includes: <ul style="list-style-type: none"> ○ Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (e.g., eviction notice, notice of termination from employment, bank statement); ○ To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of "at risk of homelessness"; or
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	<ul style="list-style-type: none"> o To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; or
<p>At Risk of Homelessness – Unaccompanied Youth See 24 CFR 576.500(c)(2)</p>	<p>If the program participant meets the criteria under paragraph (2) or (3) of the “at risk of homelessness” definition in § 576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.</p>
<p>At Risk of Homelessness – Families with Children and Youth See 24 CFR 576.500(c)(2)</p>	<p>If the program participant meets the criteria under paragraph (2) or (3) of the “at risk of homelessness” definition in § 576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.),</p>

	section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.
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General Program Documentation

- Completed Assessment (including data on secondary adults and children)
- Signed HMIS Release(s) (For all adult members of the household)
- Income Verification (if applicable)
- Backup Documentation (Paystubs, third Party Verifications, etc.)
- Housing Status Verification
- Backup Documentation (Doubled-Up Home Visit Form, Signed Note from Shelter, etc.)
- Lack of Resources Documentation
- Current Household Budget
- Bank Statements/Credit Report
- Other documents to illustrate lack of resources
- Staff Certification of Eligibility
- Case Notes and Housing Stabilization Plan
- Re-Evaluation of Eligibility (Completed every 3-months for HP and 12-months for RR)
- All OTHER documents and information collected during RR/HP services
- Financial Assistance Forms
- Lead Compliance Documentation
- Current Unit Inspection Report (Habitability)
- Signed Lease Containing Participant’s Name(s)
- Rent Reasonableness Documentation
- Utility Bills (if paid with RR/HP funds)
- Copies of financial assistance payments (checks, POs, etc.)

Required Documentation based on Component Type

	Emergency Shelter	Street Outreach	Rapid Re-housing	Homelessness Prevention
Intake/ Discharge Form	Yes	Yes	Yes	Yes
Case or Service Notes	Yes	Yes	Yes	Yes

HMIS Release	Yes	Yes	Yes	Yes
Document of Homeless Status	Yes (HMIS release sufficient)	Yes	Yes	Yes
Income Documentation	No	No	No	Yes
Resource Documentation (at intake)	No	No	Yes	Yes
Re-certification of Income/ Resources	No	No	Yes (annually)	Yes, Every 3 months

Case / Service Notes Best Practices

Complete case notes for all transactions with participants

- DO focus on tracking progress and explaining or justifying program eligibility or service decisions.
- DO include pertinent additional information or explain incongruities in the participant’s file.
- DO make sure notes are legible and securely stored in the participant file (either electronically in HMIS or in a paper file).
- DO sufficiently detail the services provided, including the date, time, type of service, and staff member(s) assisting.
- DO spell out the participant’s housing plan (to leave or avoid shelter) and any goals they might have set for themselves.

Documentation of Income

Documentation of income is required at the following points:

- Homelessness Prevention – Intake and recertification (every 3 months)
- Rapid Re-housing – Annual recertification (annually)

For participants utilizing the Emergency Shelter, Essential Services, Rapid Re-housing, and Street Outreach documentation of income AT INTAKE is not required. There are no recertification requirements for Shelter, Services, and Street Outreach.

For participants utilizing Homelessness Prevention, ESG programs must calculate the annual income of an individual or family as described in 24CFR 5.609.

Section 7: Recordkeeping and Reporting Requirements

Subrecipients are responsible for verifying and documenting the eligibility of all ESG participants prior to providing ESG shelter and/or assistance. They are also responsible for maintaining this documentation in the participant case file.

Intake Procedures for Documenting Homeless Status

The subrecipient must require documentation at intake of the evidence relied upon to establish and verify homeless status. For each individual and family who receives ESG assistance, the records must include the evidence relied upon to establish and verify the individual or family's at-risk of homelessness status. Such records must also include:

- Documentation that meets the definition of "at risk of homelessness" 24 CFR §576.2.
 - Source documents (notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears)
- Determination of annual income

For each individual and family determined ineligible to receive ESG assistance, the records must include documentation of the reason for that determination.

Income Documentation required to be included in RRH and HP files

For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

- Income evaluation form containing the minimum requirements specified by HUD and completed by the subrecipient; and
- Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement)

Acceptable Alternatives to Income Source Documentation

The following are acceptable alternatives to income source documentation:

- A written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
- To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

If the program participant meets the criteria under paragraph (2) or (3) of the "at risk of homelessness" definition in §576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et

seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.

Program Participant Records

In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:

- The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;
- Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities:
 - Fair Market Rent 24 CFR §576.106(d)
 - Rent Reasonableness 24 CFR §576.106(d)
 - Housing Standards 24 CFR 576.403(c)
 - Lead-based paint requirements 24 CFR §576.403(a)
 - Lease between the program participant and landlord 24 CFR §576.106(g)
 - Rental assistance agreement between the landlord and recipient or ESG programs 24 CFR §576.106(e)
 - Maximum Amounts and Periods of Assistance (24- month cap in 3-year period) 24 CFR §576.105(c) & §576.106(a)
 - Participation in HMIS 24 CFR §576.400(f)
 - Prohibition of use with other subsidies 24 CFR §576.105(d) & §576.106(c)
- Where applicable, compliance with the termination of assistance requirement in § 576.402.

Participant Records Additional Requirements

Each subrecipient must keep two sets of records per program participant:

- Demographic Records - Documentation illustrating data elements required by HUD (participants may refuse to answer questions). These records may be stored in HMIS or equivalent database
- Service Records - Documentation illustrating provision of services may include case notes, case plans, "sign-up" sheets, bed lists, leases, etc.

Centralized or Coordinated Assessment

Subrecipients must keep documentation evidencing the use of, and written intake procedures for, centralized or coordinated assessment system(s) developed by the CoC in accordance with the requirements established by HUD. Sub-recipients will follow the Coordinated Entry process as stated in the Dayton-Kettering-Montgomery County CoC Written Standards.

Rental Assistance Agreements and Payments

Subrecipient records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance,

and supporting documentation for these payments, including dates of occupancy by program participants.

Utility Allowance

Subrecipient records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

Shelter and Housing Standards

The records must include documentation of compliance with the shelter and housing standards in § 576.403, including inspection reports.

- Lead-based paint remediation and disclosure. (Required for all ESG funded shelter facilities and all housing occupied by program participants.)
- Minimum standards for permanent housing.

Emergency Shelter Facilities

The City must keep records of the emergency shelters assisted under the ESG program, including the amount and type of assistance provided to each emergency shelter.

As applicable, the City's records must also include documentation of the value of the building before the rehabilitation of an existing emergency shelter or after the conversion of a building into an emergency shelter and copies of the recorded deed or use restrictions.

If ESG funds are used to improve or renovate a building used for emergency shelter, the subrecipient will comply with the minimum terms of use as set forth by 24 CFR §576.102(c)

Section 8: Housing Inspection Requirements

ESG funds cannot be used to help a program participant remain in or move into housing that does not meet the minimum habitability standards under 24 CFR576.403(c). Subrecipients must document compliance with the ESG habitability standards in the program participant's file. This restriction applies to all activities under the Homeless Prevention and Rapid Re-housing components, including rental assistance and housing relocation and stabilization services. See Appendix C. In addition:

- If an eligible household needs homeless prevention to remain in an existing unit, the assistance can only be provided if that unit meets the minimum standards.
- If an eligible household needs homelessness prevention or rapid re-housing assistance to move to a new unit, the assistance can only be provided if the new unit meets the minimum standards.
- The unit the household is leaving does not need to be inspected.
- Minimum standards are required even if one-time assistance is provided (e.g. rental arrears, security deposit, etc.)
- The same standards apply regardless of the amount of rental assistance and/or housing relocation and stabilizations services funds involved.

Lead-based Paint Requirements

The City and Subrecipients must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, H, J, K, M, and R. Subrecipients are responsible for ensuring that property owners and managers meet the lead-based paint requirements. A lead-based paint visual assessment is required for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
- The unit was built before 1978; and
- A child age six (6) or younger or a pregnant woman will be residing in the unit.

If the child age 6 or younger has been identified with an Identified Environmental Intervention Blood Lead Level, the inspection must be done by a Certified Lead-based Paint Risk Assessor. These regulations apply regardless of whether a household is staying in an existing unit or moving to a new unit and they must be complied with prior to providing ESG assistance. The visual assessment must be completed prior to ESG assistance and annually thereafter.

A copy of the results of the lead-based paint assessment shall be placed in the case file. Should a visual assessment reveal a problem with paint surfaces, the subrecipient cannot approve the unit for assistance until the deteriorating paint has been repaired. At this point the subrecipient will decide one of the following:

1. Work with the property owner/manager to complete needed paint stabilization activities and clearance,
2. Work with the household to locate a different (lead- safe) unit, or
3. Refer the client to a different program if ESG assistance cannot be provided.

Disclosure Requirements

Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:

- Disclosure form for rental properties disclosing the presence of known and unknown lead-based paint (link: https://www.epa.gov/sites/production/files/documents/lesr_eng.pdf)

AND

- A copy of the "Protect Your Family from Lead in the Home" pamphlet. (link: https://www.hud.gov/sites/documents/PROTECT_FAMILY_LEAD_2012.PDF)

It is recommended subrecipients share (or ensure they receive) the information from the links above.

The Visual Assessment Exceptions

Visual assessments are not triggered under the following circumstances:

- It is a zero-bedroom or single room occupancy (SRO-sized) unit;
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- The property has had all lead-based paint identified and removed in accordance with HUD regulations;

- The participant is receiving Federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months – e.g., if the participant has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears (note, in such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted from the ESG programs administering the other form of assistance for the ESG case file); or
- It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the conditions outlined above are met, the subrecipient must document the condition and place a copy in the case file.

Section 9: Rental Assistance

Fair Market Rent and Rent Reasonableness

Rental assistance may only be provided for housing units for which the total rent does not exceed the fair market rent (FMR) established by HUD, as provided under 24 CFR part 888. The total rent for the unit must also comply with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. These rent restrictions are intended to ensure that program participants can remain in their housing after their ESG assistance ends.

To provide rental assistance with ESG funds, the rental rate plus utilities cannot exceed both HUD's published FMR and/or the rent reasonableness standards, i.e. three (3) comparable rent units. Otherwise stated, Contract Rent + Utilities = Gross Rent. The Gross Rent cannot exceed the FMR or the three (3) rent comparable units provided in the file.

Calculating Gross Rent

If tenants are responsible for paying their own utilities, the monthly utility allowance must be added to the contract rent amount to calculate gross rent, to determine whether the unit meets the FMR and rent reasonableness standards. Utility costs may include gas, electric, water, sewer, and trash. Telephone, cable or satellite television service and internet service are not included in FMRs and are not allowable costs under ESG.

To determine whether rent is acceptable for ESG rental assistance, the gross rent (rent + utilities) for the current or new unit must first be compared with FMR limits. If the unit's gross rent is at or below FMR limits, then the gross rent must be used to determine rent reasonableness:

- If the gross rent for the unit is below both the FMR and the rent reasonableness standard, then ESG funds may be used to pay rent for the unit.
- If the gross rent for the unit exceeds either FMR or rent reasonableness standard, ESG funds cannot be used to pay any portion of the rent.
- If the reasonable rent for a specific unit in a community is lower than the FMR, then the rent for the unit assisted with ESG funds must not exceed the lesser of the FMR or the rent reasonableness standard.
- If the gross rent for the unit exceeds either the rent reasonableness standard or FMR, ESG recipients are prohibited from using ESG funds for any portion of the rent, even if the household is willing and/or able to pay the difference.

Deposits and Non-Refundable Fees

The security deposit cannot exceed one (1) month's rent (limited to one per household per grant term) and utility deposits are an eligible activity if needed. Deposits will remain with the household. Nonrefundable fees such as cleaning fees and late fees cannot be paid from ESG funds. Security Deposits are not included on the IRS 1099 form (include only rent amounts paid to the Landlord).

Rent Reasonableness

Rent for units assisted under the ESG Program (with rental assistance) must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. Documentation shall include market surveys, classified ads, or information from real estate agents, along with a signed lease. When comparing rent reasonableness, the proposed unit must be compared to three (3) other comparable units.

1. Do not provide rental assistance if the rent exceeds the Fair Market Rent (FMR) or does not comply with HUD's standard of rent reasonableness.
2. Determine and document rent reasonableness for all units receiving ESG rental assistance (including arrears) and/or security deposit assistance.
3. This requirement applies to both homelessness prevention and rapid re-housing assistance.

Rental Assistance Agreements

When rental assistance is supported with ESG funds, a program participant and the landlord must have a written lease. In addition, a rental assistance agreement is required between the ESG program and the landlord. The subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

The subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the landlord must give the subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant.

The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The rental assistance agreement with the landlord must terminate and no further rental assistance payments under that agreement may be made if:

- The program participant moves out of the housing unit for which the program participant has a lease;
- The lease terminates and is not renewed; or
- The program participant becomes ineligible to receive ESG rental assistance.

Lease Requirements

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Each lease executed on or after *December 16, 2016* must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). If the housing is not assisted under another “covered housing program,” as defined in 24 CFR 5.2003, the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner’s financial records, rent ledgers, or canceled checks.

Section 10: Habitability Standards for Emergency Shelters and Permanent Housing

	Minimum safety, sanitation, and privacy standards for emergency shelter §576.403(b)*	Minimum habitability standards for permanent housing §576.403(c)**
Structure and Materials	The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents. (Any renovation to emergency shelters, including major rehabilitation and conversion, carried out with ESG assistance must use Energy Star	The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
Access	(2) Access. The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.	
Space and Security	Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and	Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.

	adequate space and security for themselves and their belongings.	
Interior Air Quality	Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.	Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
Water Supply	The shelter's water supply must be free of contamination	The water supply must be free from contamination.
Sanitary Facilities	Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.	Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
Thermal Environment	The shelter must have any necessary heating/cooling facilities in proper operating condition.	The housing must have any necessary heating/cooling facilities in proper operating condition.
Illumination and Electricity	The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.	The structure must have adequate natural or artificial illumination to permit indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
Food Preparation	Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.	All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
Sanitary Conditions	The shelter must be maintained in a sanitary condition.	The housing must be maintained in a sanitary condition.
Fire Safety	There must be at least one working smoke detector in each occupied unity of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least on working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.	1) There must be a second means of exiting the building in the event of fire or other emergency. 2) Each unit must include at least on battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.

3) The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

*The minimum safety, sanitation, and privacy standards for emergency shelter apply to emergency shelters receiving ESG funds for renovation (including conversion and major rehabilitation) and/or operating costs. In addition, any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation or other renovation must meet also state or local government safety and sanitation standards, as applicable. The recipient may also establish standards that exceed or add to these minimum standards.

** ESG funds cannot be used to help a program participant remain or move into housing that does not meet these minimum habitability standards. The recipient may also establish standards that exceed or add to these minimum standards.

All other ESG eligibility requirements apply.

Section 11: Service Delivery Requirements

Equal Access to Housing Regardless of Sexual Orientation or Gender Identity

On February 3, 2012, HUD published a final rule in the Federal Register entitled, "Equal Access to Housing in HUD Programs regardless of Sexual Orientation or Gender Identity". This rule became effective March 5, 2012 and was amended in September 2016 with 24 CFR §5.106. The rule provides a regulatory provision that prohibits considering a person's marital status, sexual orientation, or gender identity in making homeless housing assistance available.

Gender identity is defined as the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity. Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents.

ESG subrecipients are required to establish equal access on gender identity policies (in line with federal rules and the requirements in this document) for:

- Program admissions
- Occupancy
- Operating policies and procedures (including privacy and security policies)

ESG funded activities are required to:

- a. Make housing available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- b. Equal access to facilities, buildings, benefits, accommodations, and services to individuals in accordance with the individual's gender identity, and in a manner that affords equal access to the individual's family.
- c. Prohibit any requirements for individuals to prove gender identity (including documentation, identification, intrusive questioning on person's anatomy or medical history, etc.)
- d. Prohibit consideration of a participant or potential participant's entry into a program because his or her appearance or behavior does not conform to gender stereotypes.
- e. Prohibit any segregation of transgender participants (e.g. transgender- only shelter or space), unless the transgender participant requests an accommodation (like a more private space) and the facility can accommodate the request.
- f. Base discharges, service restrictions, and warnings following any incidents involving transgender participants ONLY on the individual's behavior, not gender identity.
- g. Have a zero tolerance for harassment of transgender residents:
- h. Staff shall recognize that harassment based on gender identity is discriminatory behavior and will be treated as such.
- i. All unacceptable behavior including, but not limited to harassment, abuse, assault, discrimination, intimidation, threats, violence and many other forms against transgender residents will be dealt with based on the program's behavior policies.
- j. Due to the high incidence of harassment of transgender people, concerns about the safety of a transgender resident will be taken with utmost seriousness.
- k. Permit any participants expressing concern to use bathrooms and dressing areas at a separate time from others in the facility.
- l. Work (to the extent feasible) with the layout of any shelter facilities to provide for privacy in bathrooms and dressing areas.
- m. Ensure that policies do not isolate or segregate participants based upon gender identity.
- n. Take reasonable steps to address any safety or privacy concerns expressed by participants. This may include:
 - a. Responding to the requests of the participant expressing concern through the addition or a privacy partition or curtain
 - b. Provision to use a nearby private restroom or office, or
 - c. Separate changing schedule.

Involuntary Family Separation

The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

Single Sex Shelters

HUD-assisted single-sex shelter is acceptable only under limited conditions in which the facilities meet both of the following requirements:

- The shelter must be for individuals only. A shelter that accepts families with children cannot be single sex. An example of this might be a shelter that serves single women only (women not in families, without children under 18), and
- The shelter must not be considered a "dwelling unit" and it must consist of a single structure with shared bedrooms or bathing facilities. This policy, which applies to ESG, is stated most clearly in the CoC interim rule, at section 578.93: "The housing may be limited to one sex where such housing consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex."

If the facility is not permitted under the HUD standards to operate as single-sex, then the project must serve people of any gender who are eligible. That means that a facility serving any families with children must serve all families with children and may not discriminate against specific families because of the gender of the head of household or child(ren).

Shelter Habitability and Lead Requirements

Whenever ESG funds (or matching funds for ESG) are used under the Emergency Shelter component for shelter operations or shelter renovations, the building must meet the minimum standards for safety, sanitation, and privacy provided in 576.403(a) (b). If cash or non-cash contributions (e.g. funds or staff time) used for renovation or shelter operations are to be contributed to the ESG program as match, the emergency shelter must meet the minimum standards, because all matching contributions must meet all requirements that apply to the ESG funds provided by HUD. Documentation of compliance with the minimum standards for emergency shelter activities must be maintained.

Shelter Operation Inspection Requirements

Any emergency shelter that receives ESG funds for shelter operations (including minor repairs) must meet the minimum safety, sanitation, and privacy standards as indicated in 24 CFR §576.403(b). In addition:

- The shelter must be inspected on-site to ensure that it meets the minimum standards before ESG funds are provided for shelter operations.
- The shelter must meet all standards for the entire period during which ESG funds are provided for operating the emergency shelter.
- If the shelter fails to meet the minimum standards, ESG funds may be used to bring it up to the minimum standards, if available.
- If the shelter continues to receive ESG shelter operating funds over a period of time, then onsite inspections must be conducted each time the shelter receives an award (annually).
- If the shelter is moved to a new site or structure, that new site or structure must meet all emergency shelter standards for the remaining period that ESG funds are used for operating expenses.

Termination of Assistance

For the purposes of this document, subrecipients shall abide by the termination policy found in the "Termination Policy" of Appendix A - CoC Written Entry Policies and Procedures.

The policies and/or procedures should be readily available to program participants either in written information or by posting the policy in a public place. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood.

If a program participant violates program requirements, the subrecipient may terminate the assistance in accordance with a formal process established by the subrecipient that recognizes the right of individuals affected. The subrecipient should exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that you terminate a program participant's assistance ONLY in the most severe cases.

To terminate ESG program rental assistance or housing relocation and stabilization services to a program participant, a formal process is required and must consist of:

1. Written notice to the program participant containing a clear statement of the reasons for termination;
2. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or subordinate of that person) who originally made or approved the termination decision; AND
3. Prompt written notice of the final decision to the program participant.

Termination does not bar the subrecipient from providing further assistance, later, to the same family or individual.

Participant Confidentiality and Privacy Policies

Subrecipients must have policies and procedures established in writing to ensure that the privacy and confidentiality of all ESG-funded program participants is protected. The ESG interim rule specifically requires that the written procedures ensure the following:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential.
- The address or general location of a domestic violence, dating violence, sexual assault, or stalking shelter funded through ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.
- The address and location of any housing of a program participant will not be made public, except as provided under a pre-existing privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

Subrecipients must also ensure that confidentiality and privacy policies meet the specific confidentiality and security requirements for HMIS data which are described in the HMIS Requirements.

It is recommended that policies and procedures include the following, at a minimum:

- Description of how participant files are to be stored and kept secure (e.g., locked files) and who has access to them.
- Assurance that participant files will not be removed from the program premises (or conditions in which this would be permitted).

- Process for obtaining written, informed consent to release participant information to an outside person/agency.
- Description of participant rights to: access their records; request updates to their records; request changes to information in their records with which they do not agree; and file a complaint if they feel their confidentiality has been breached.
- Provisions for training staff on privacy and confidentiality procedures. Training should include the following points:
 - Sharing participant information with other program staff should be limited only to staff directly involved with delivering services to the participant, should only include the information necessary for service delivery, and should occur only using secure methods or in private spaces.
 - Prohibition against sharing any private account information (e.g., usernames, passwords, etc.).
 - Disciplinary action that will result from failing to follow the established privacy and confidentiality policies.

Client confidentiality also applies to City and HUD on behalf of the funded program. Any information obtained by City and/or HUD staff, as part of a performance review, will be held in the strictest confidence. City and/or HUD staff will not include client Personally Identifiable Information (PII) in review working papers or in performance review reports. Additionally, if the City or HUD staff asks for client files related to a performance/ monitoring review, then the agency must redact all Personal Identifiable Information (PPI) from any files that are being sent by mail or electronically, unless a secure, encrypted method can be used for electronic transmission.

Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault or Stalking

Participants receiving ESG assistance may not be denied, terminated or evicted from housing on the basis or as a direct result of having been a victim of domestic or dating violence, sexual assault, or stalking.

Lease Bifurcation

When a member of a household engages in criminal activity directly related to domestic or dating violence, sexual assault, or stalking, the owner may remove the abuser or perpetrator from the lease without affecting the occupancy rights of the victim. If the owner removes the abuser through bifurcation, and that person was the eligible tenant under the program, the owner must allow any remaining tenant(s), who are not already eligible, time to apply to establish eligibility under the ESG or another housing program. Before bifurcating a lease, an owner may, but is not required to, ask the tenant for documentation or certification of the incident.

Emergency Transfer

CoC must create/update their Emergency Transfer Plan annually; the due date coincides with the ESG funding round. The participant may be asked to submit a written request or fill out Form HUD-5383, Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking. Agencies and owners must keep requests for emergency transfers, and the location of any such move, in strict confidence. If applicants or participants are asked to "certify" that they are or have been a victim, they must be given 14 business days from that date to seek documentation; housing

providers may extend the time period to submit documentation. Documentation may include a completed HUD-approved certification form (HUD 5382); a police report, protective order, or restraining order; a statement by an attorney, medical or mental health professional; or any other statement or evidence that the owner has agreed to accept. Remaining tenants who had not already established eligibility for assistance shall be provided at least 90 days to establish program eligibility.

Confidentiality

Housing providers and property owners must keep strictly confidential any information provided concerning the incident(s). Information may not be entered into any shared database or disclosed, except to the extent that disclosure is consented to by the victim in a specific, time-limited release; required for use in an eviction proceeding or hearing regarding termination of assistance; or otherwise required by law. VAWA requires all documentation relating to incidents be stored in a separate, secure area.

Homeless Management Information System and Reporting Requirements

ESG requires participation in HMIS, or a comparable database, and must follow all state and federal laws governing HMIS, including:

1. Collecting informed written consent from program participants,
2. Not denying service based solely on program participant refusal to provide data to an HMIS,
3. Protecting program participant confidentiality,
4. Not collecting, in HMIS, personally identifying information from program participants that are victims of domestic violence; however, use of another comparable database is acceptable,
5. Using the HMIS as a tool to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
6. Conducting the initial evaluation through HMIS, including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
7. Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
8. Monitoring and evaluating program participant progress;
9. Providing information and referrals to other providers within HMIS guidelines;
10. Developing an individualized housing and service plan, including planning a path to permanent housing stability;
11. Conducting re-evaluations required through HMIS, and
12. Other requirements defined in RCW 43.185C.030, 43.185C.180, and VAWA Reauthorization Section 605.

Households should remain in the program(s) in HMIS, for which they were initially enrolled, (Homeless Prevention or Rapid Re-housing) throughout their term of service.

The HMIS standards require that the subrecipient enter income sources and amounts and non-cash benefits received in the past thirty (30) days during three points in time:

1. At entry into program
2. At least once every three (3) months or annually, depending on the re-assessment period

Do not use this amount documented through this calculation to determine eligibility, but rather use it to show that the household does lack resources to maintain housing.

Reporting Requirements

The subrecipient will compile data for ESG reporting using HMIS. Enter data at the time of service. Data completeness and integrity are key elements to successful use of HMIS. Programs should prioritize data quality and reporting.

Quarterly Progress Reports

The subrecipients will submit program participant reports by the end of the month following each quarter end –September 30th, December 31st, March 31st, and June 30th.

Personal Identifying Data

Individually identifying information for or about an individual including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, could include:

1. A first and last name;
2. A home or other physical address;
3. Contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number);
4. A social security number; and
5. Any other information, including date of birth, racial or ethnic background, or religious affiliation that, in combination with any other non-personally identifying information, would serve to identify any individual collecting "non-identified" client records

The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter.

Electronic Confidentiality

Electronically collect client information for the limited purpose of administering ESG in accordance with the rules and regulation on HMIS. The following guidelines apply to the use of a computer for the purposes of confidentiality:

1. The computer terminal(s) used must be located in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible for viewing client records.
2. The computer monitor must be cleared, or a screen saver activated immediately after accessing a client record.
3. The computer terminal must be on a "locked" mode or turned off if the terminal is unattended.
4. Access to HMIS shall be given to authorized staff persons and only insofar as access is required for performing the work required, pursuant to ESG.

Faith-Based Activities

Subrecipients must document their compliance with the faith-based activities requirements under 24 CFR 576.406 and will not utilize ESG funds for inherently religious activities prohibited in the federal statute, such as worship, religious instruction or proselytization.

Subrecipients who are religious/faith-based organizations or faith-based activities must comply with the following standards:

- Are eligible on same basis as other organizations
- Retain their independence
- Must not engage in inherently religious activities as part of ESG-funded activities
- Must not discriminate based on religion or religious belief
- Must not use ESG funds to rehabilitate structures used for inherently religious activities (e.g., chapels or sanctuaries)

Section 12: Grant Administration

Grant Rewards and Spending Requirements

The City of Dayton receives an ESG allocation from HUD each year. As an ESG recipient, Dayton is required to consult with the local Continuum of Care to determine how to allocate ESG funds to subrecipients. The grant amount, except for administrative costs, must be obligated by the City of Dayton within 180 days after the date that HUD signs the grant agreement. Funds are considered obligated through either an agreement or award letter with a subrecipient that stipulates the required payment; a procurement contract; or a written designation of a department within the City of Dayton government to carry out an eligible activity.

In Dayton, organizations receive notification of their grant award through the receipt of an “award letter”. The award letter will list a date by which organizations are expected to submit a scope and budget for the project. Please note that organizations are expected to respond to request for contract documentation by the date outlined on their award letter in order to expedite the contracting process.

Dayton must draw down and expend funds from the year’s grant at least once per quarter of the program year. The full grant amount must be expended within 24 months after the date that HUD signs the grant agreement. The City of Dayton is required to pay subrecipients for eligible activities within 30 days after receiving a complete payment request.

Subrecipients are expected to spend the funds provided within the initial grant term. Requests for extension must occur 90 days prior to contract expiration in order to be considered. Repeated extension requests may result in a reduction in future grant awards. Organizations who are not on track to expend their awarded contract three months into the contract will be expected to submit a spending plan. If the organization is still not on track at six months, the City of Dayton reserves the right to reallocate the funds to a proven spender.

Additional information about obligation, expenditure, and payment requirements can be found in 24 CFR 576.203.

Subrecipients shall submit all invoices and supporting records and documentation to the City’s Department of Planning and Community Development. Subrecipients requesting reimbursement must adhere to the following:

1. Invoice Information (See Appendix X)

Subrecipient’s invoice shall contain the following:

- a. City Contract Number;
- b. Invoice Number;
- c. Period Covered;

- d. Accomplishments Summary, etc;
- e. Written documentation verifying the weekly payroll reports were reviewed and comply with approved wage determination;
- f. Total Amount Requested;
- g. List of Enclosed Documents;
- h. Agreement funding Balance;
- i. Other information Subrecipient desires to communicate to the City's Project Coordinator; and
- j. Signature of Subrecipient's Fiscal officer or Chief Official.

2. Supporting Documentation

Subrecipients shall collect, maintain, and submit the following documentation and information with invoices for payment.

For project administration, the Subrecipient will include:

- a. Number of hours worked on the program/project funded, and
- b. Summary of work performed by employee during the time for which payment was made

For Supplies/materials, the documentation and information shall include:

- a. Invoice from vendor or company detailing the item(s)/services purchased and a copy of Contractor's check showing that the Subrecipient paid the vendor for goods/services

For professional services provided by a subcontracted entity, the documentation and information shall include:

- a. A copy of the subcontract must be submitted (at least one during the Agreement period, if the contractor will seek reimbursement on several invoices); and
- b. Contractor must require that the subcontracted agency submit the same level of documentation and information that the contractor must provide to seek payment from the City and such information and documentation must be submitted by the contractor to the City with its invoice. At minimum, the subcontracted agency should provide contractor a cover memo, on company letterhead, which summarizes the request for payment, the amount requested, services provided for the requested amount, and information on clients served, if applicable.

Failure to submit timely requests for reimbursement can result in reallocations, reductions in awards, or loss of future program funding.

Unless disputed or the City determines that there is insufficient documentation to substantiate the invoice, the City will tender payment to the subrecipient within thirty (30) days from the date the City receives the invoice.

Request for Payment can be emailed to the program manager directly as one pdf file or can be delivered to the following address to the attention of your program manager:

City of Dayton
Planning and Community Development Department

101 W Third Street,
Dayton, OH 45042

Client Confidentiality

Confidentiality of all records is required. All records containing personally identifying information of any applicant for and/or recipient of ESG assistance will be kept secure and confidential. Each subrecipient must have written procedures to ensure the following:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or ESG program and consistent with state and local laws regarding privacy and obligations of confidentiality.
- Information regarding participants will be released only after appropriate authorization to release and/or obtain information is completed.
- Access to client records should always be restricted to the employee or agent that must have access to the client's information in order to properly perform their normal job functions.

Subrecipients shall inform clients about their rights to confidentiality and disclose that all information contained in their file is confidential. Employees or program funders with access to information about the client are bound by confidentiality guidelines and will not disclose this information without prior written consent.

Upon written request, ESG clients should have access to review their records and case file content. A private location should be provided to the client for this purpose within the ESG program. Clients should not be allowed to remove their case file from the ESG program; however, they may be granted copies of file contents upon request.

Client files will be retained according to the length of time specified in 24 CFR §576.500(y).

Protection of Personal Identifiable Information (PPI)

The City and all subrecipients may receive personally identifiable information (PII) while implementing grant and program activities. This information may include applicant or beneficiary names, addresses, income verification documents, disability status, employment status, etc. In order to protect PII, the City and its subrecipient must adhere to the following standards to ensure PPI data is protected:

- A. Maintain hard copies of PII records in locked file cabinets or locked offices
- B. Password protect electronic folders and/or files containing PII
- C. Establish parameters for the electronic transmission of PII (email encryption, file sharing services)
- D. Information and passwords should be shared with staff only, or with other agencies, like auditors or Federal agencies, after verifying their identity

- E. Properly and securely dispose of hard and electronic copies of documents if after the retention period
- F. Develop protocols should a breach of data occur

Documentation Standards

In general, there is an order of preference for all documentation types and projects must document due diligence of efforts to obtain all documentation. Circumstances, as well as the type of services or housing received, will affect the ability of intake workers/case managers to obtain some forms of documentation. The order of priority among documentation is third-party documentation first, intake worker/case manager observation second, and certification by the individual or head of household seeking assistance third.

- A lack of third-party documentation shall not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

Recordkeeping requirements allow already available documentation, where it is available, as third-party documentation. Already available documentation includes certification or other appropriate service transactions recorded in a Homeless Management Information System (HMIS) or other database that meet certain standards. Information recorded in HMIS must include the following:

- Retain an auditable history of all entries including the person who entered the data;
- The date of entry, and the change made; and
- Must prevent overrides of the dates when changes are made.
 - Already available documentation may also include discharge paperwork, to verify a stay in an institution, shelter, or other facility.

For emergency shelters that require clients to be present every night to gain access to a bed for just that night, the City would expect to see certification by the individual or head of household as the primary method of establishing homeless eligibility. The City would also consider a sign-in sheet, with a certification from the individual or head of household seeking assistance, as meeting this standard. However, for permanent housing and non-emergency services, such as employment assistance, the City will expect to see third party documentation, such as pay stubs, copy of recent bank statements, or filed tax documents.

Adequate Source Documentation

The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition. Acceptable evidence includes:

- A. Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);
- B. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in § 576.2; or

- C. To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; and

For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

- A. Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or subrecipient; and
- B. Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement)
- C. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or

To the extent that source documents and third-party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

Financial Records

The City and all subrecipients must retain supporting documentation for all costs charged to the ESG grant. Per 24 CFR 576.500(u), the following records are required, at a minimum:

- A. The recipient must retain supporting documentation for all costs charged to the ESG grant.
- B. The recipient and its subrecipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under "§ 576.101 through 576.109, financial management in 2 CFR 200.302, and the cost principles in 2 CFR part 200, subpart E.
- C. The recipient and its subrecipients must retain records of the receipt and use of program income.
- D. The recipient must keep documentation of compliance with the expenditure limits in § 576.100 and the expenditure deadline in § 576.203.

Access to Records

Subrecipients must comply with the requirements for access to records which establish that HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, and the City of Dayton, must have the right of access to all documents, papers, or other records kept by the subrecipient relevant to the ESG award. This also includes access to

subrecipients' staff for the purpose of interview and discussion of documents. These rights last as long as the records are retained.

Restrictions on Public Access to Records

No Federal awarding agency may place restrictions on the non-Federal entity that limit public access to the records of the non-Federal entity pertinent to a Federal award, except for protected personally identifiable information (PII) or when the Federal awarding agency can demonstrate that such records will be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) or controlled unclassified information pursuant to Executive Order 13556 if the records had belonged to the Federal awarding agency. The Freedom of Information Act (5 U.S.C.552) (FOIA) does not apply to those records that remain under a non-Federal entity's control except as required under § 200.315 Intangible property. Unless required by Federal, state, or local statute, non-Federal entities are not required to permit public access to their records. The non-Federal entity's records provided to a Federal agency generally will be subject to FOIA and applicable exemptions.

Methods for Collection, Transmission, and Storage of Information

Per 2 CFR 200.335; The City of Dayton, whenever feasible, should collect, transmit, and store Federal award-related information in open and machine-readable formats rather than in closed formats or on paper. When original records are electronic and cannot be altered, there is no need to create and retain paper copies. When original records are paper, electronic versions may be substituted through the use of duplication or other forms of electronic media provided that they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.

Insurance Coverage

Subrecipients must carry General Liability Insurance and Crime and Dishonesty Insurance. The Fiduciary must maintain documentation of insurance coverage, including sub-grantees, with their Agency records.

Matching Funds

ESG requires a match of dollar for dollar from eligible cash and non-cash contributions. The City of Dayton and/or Subrecipients must match ESG grant funds dollar-for-dollar pursuant to 24 CFR 576.201.

1. Matching funds shall be provided after the date of the grant award.
2. Funds used to match a previous ESG grant may not be used to match a subsequent grant award.
3. A Subrecipient may comply with this requirement by providing the matching funds from any source, including any Federal source other than the ESG program, as well as state, local and private sources.
4. A Subrecipient must ensure the laws governing any federal funds to be used do not prohibit those funds from being used to match ESG funds.
5. In order to meet the matching requirement, the matching contributions must meet all the requirements that apply to the ESG funds provided by HUD as required by 24 CFR 576.201(c).
6. Matching contributions may be in the form of the following:

- a. Cash contributions; or
- b. Non-cash contributions, calculated per requirements in 24 CFR 576.201(e), include the value of any real property, equipment, goods, or services contributed to the Subrecipient's ESG program, provided that if a Subrecipient had to pay for them with grant funds, the costs would have been allowable. Non-cash contributions may include:
 - i. The purchase value of any donated material or building. A Subrecipient shall determine the value of any donated material or building, or of any lease, using a method reasonably calculated to establish a fair market value.
 - ii. Match in the form of services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in a Subrecipient's organization. If a Subrecipient does not have employees performing similar work the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.
 - iii. Costs paid by program income may count toward meeting a Subrecipient's matching requirements, provided the costs are eligible ESG costs that supplement the ESG program.

Conflicts of Interest

The City and its subrecipients must keep records to show compliance with the organizational conflicts-of-interest requirements in § 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in § 576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

Organizational Conflicts

The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the sub-recipient, or a parent or subsidiary of the sub-recipient. No subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under § 576.401 or administer homelessness prevention assistance under § 576.103. Subrecipients must also maintain written standards of conduct covering organizational conflicts of interest required under 2 CFR 200.318.

Individual Conflicts of Interest

For the procurement of goods and services, subrecipients must comply with codes of conduct and conflict of interest requirements under 2 CFR 200.317 and 318. For all other transactions and activities, the following restrictions apply:

- a. *Conflicts Prohibited* - No person described in paragraph (b) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure

- b. *Persons Covered* - The conflict-of-interest provisions of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients.

Cost Allocability – Timesheets

Subrecipient reimbursement requests for personal services, including salaries and fringes, for employees' services should be reasonable for the services rendered in relation to ESG activities. Expenses should conform to the organization's written policies and expenses and should be allocated consistently to Federal and non-Federal activities.

As per 2 CFR 200.403, costs should meet the following criteria to be considered allowable for Federal funding:

- A. Be necessary and reasonable for the performance of the Federal award and be allocable thereto under these principles.
- B. Conform to any limitations or exclusions set forth in these principles or in the Federal award as to types or amount of cost items.
- C. Be consistent with policies and procedures that apply uniformly to both federally-financed and other activities of the non-Federal entity.
- D. Be accorded consistent treatment. A cost may not be assigned to a Federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the Federal award as an indirect cost.
- E. Be determined in accordance with generally accepted accounting principles (GAAP), except, for state and local governments and Indian tribes only, as otherwise provided for in this part.
- F. Not be included as a cost or used to meet cost sharing or matching requirements of any other federally-financed program in either the current or a prior period.
- G. Be adequately documented.

Homeless Participation

For the purposes of this document, "Participation Inclusion" policy as detailed in the CoC, the City and/or subrecipient must document its compliance with the homeless participation requirements under 24 CFR 576.405. The city and/or subrecipient must provide avenues for homeless participation in programs supported by ESG fund via the following:

- a. Provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the City, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG);
- b. If unable to meet the requirements under paragraph (a), the City must develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220; or
- c. To the maximum extent practicable, the City or subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

Other Federal Requirements

The recipient and its subrecipients must document their compliance with the Federal requirements in 576.407 and 576.409, as applicable, including:

Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under 576.407(a) and the affirmative outreach requirements in 576.407(b), including:

- Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds; and
- Documentation required under 24 CFR 5.168 in regard to the recipient's Assessment of Fair Housing and the certification that the recipient will affirmatively further fair housing.
- Records demonstrating compliance with the uniform administrative requirements in 2 CFR part 200.
- Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
- Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.
- Data on emergency transfers requested under §576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.
- Relocation. The records must include documentation of compliance with the displacement, relocation, and acquisition requirements in § 576.408.

ESG Programs and Contractors

The City must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to recipients, and documentation of all monitoring and sanctions of subrecipients, as applicable.

The City and subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 2 CFR § 200 subpart D.

The City must ensure that its subrecipients comply with the recordkeeping requirements specified by the recipient and HUD notice or regulations.

Monitoring

The City of Dayton has a duty to ensure that all ESG funds are spent in a timely, correct fashion according to the federal and state regulations that guide the ESG program. Monitoring has proven an effective tool for improving subrecipient performance, establishing community best practices, and avoiding problems and challenges that subrecipients may encounter.

Subrecipients will be monitored by the City of Dayton on a regular basis. They may also be monitored by HUD, either as a part of the recipient, the City of Dayton, being monitored, or they may be directly monitored by HUD.

The City of Dayton seeks to ensure that monitoring is as positive of an experience as it can be. The overall goal is to improve the provision of service for people who experience homelessness, within the constraints of the regulations. The City of Dayton undertakes not to use the monitoring compliance process in a punitive, negative way.

On-Site Monitoring

- On-site monitoring involves staff from the City of Dayton working on-site at the agency or project. The monitoring will usually involve some or all of the following activities: Interviews with staff and residents that either work at or use the project
- A review of financial and project materials related to the project
- A physical inspection of the project.

On-site monitoring can take anywhere from half a day to several days, depending on the activities reviewed and the size of the project.

If the City of Dayton monitors on-site, City staff will need access to a quiet space (such as a table and chair) where they can work and review materials, as well as a confidential space where they can speak to managers, staff, and clients.

Remote Monitoring

Remote monitoring can take place at any time during the year. The City of Dayton reserves the right to request materials that include but are not limited to: client files, program resources, policies and procedures, and financial back up materials.

If the City of Dayton requests that the program or agency submits materials to be reviewed remotely, the agency will need to submit the information to the City of Dayton electronically. It is the agency's responsibility to submit data in a secure, encrypted way or to agree with the City of Dayton on a mutually acceptable way to transmit the data that redacts all personal identifiable information.

The Monitoring Visit

The City of Dayton will communicate with an agency at least 3 weeks in advance to give them time to make preparation for the visit. The agency has the right to request a different date, if the agency or program has another significant event at that time. The City of Dayton will follow up with an email outlining the monitoring schedule, the activities to be reviewed, and the names of the City staff who will be conducting the monitoring visit.

The City of Dayton may request information from a program or agency in advance of the visit as part of its preparation. This will help staff to have a fuller understanding of the goals and objectives of the program.

Entrance Conference

At the beginning of the monitoring visit, the City of Dayton staff will conduct an entrance conference with agency and program managers and staff. The purpose of this meeting will be to communicate the objectives, scope, and focus of the monitoring visit. During this meeting City of Dayton staff will:

- Explain how the monitoring visit will be conducted
- Establish key points of contact within the agency that can assist during the monitoring

- Confirm activities that will be reviewed and make arrangements for files and materials to be made available
- Identify key staff and clients to be interviewed
- Schedule a physical inspection of the building (as needed)

During the Visit

The City of Dayton staff will spend the monitoring visit carrying out the activities listed above. During the visit access to a private room and internet will be needed. They will evaluate the data that an agency provides and draw conclusions. The conclusions will be supported by documentation, particularly if these conclusions become findings or concerns. During the visit, the City of Dayton reserves the right to request additional files, materials, or people to be interviewed.

Exit Conference

At the end of the visit, City of Dayton staff will meet with the agency to provide a short, verbal summary of the conclusions that they have drawn.

An agency will have the opportunity to comment on any problem areas that City of Dayton staff found during the visit, so that program staff have the opportunity to correct perceived deficiencies or noncompliance at the time of the visit.

After the Monitoring Visit

Within 30 days, the City of Dayton will send a letter summarizing the monitoring activities and any conclusions that may have been drawn from these.

This will include one or more of the following:

- That there were areas of concern (deficiencies in performance that are not based on a regulatory or statutory requirement, but nevertheless should be brought to the attention of the agency)
- That there were findings (deficiencies that are not in compliance with regulatory or statutory requirements)
- That there were no areas of concern or findings noted during the monitoring visit

If the letter outlines a finding, it will also include a summary of the reason that the City of Dayton has classified the issue as a finding, and how the agency or program can correct the finding. The City of Dayton will also establish a timeframe on when the corrective action should be completed by.

It is important to remember that until the agency can conclusively show that each finding has been corrected, and that the City of Dayton has acknowledged this in writing, that each finding will remain open. This may have implications for future applications for ESG funding.

Record Retention

All records pertaining to each fiscal year of ESG funds, including ESG client files and financial records to support billings, must be retained for the greater of five (5) years or the period specified below:

- A. Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual as well as other program participant records must be retained for five (5) years after the expenditure of all funds from the grant under which the program participant was served.

- B. Where the ESG funds that are used for the renovation of an emergency shelter exceed 75 percent of the value of the building before renovation, records must be retained until ten (10) years after the date that ESG funds are first obligated for the renovation.
- C. Where the ESG funds that are used to convert a building into an emergency shelter exceed 75 percent of the value of the building after conversion, records must be retained until ten (10) years after the date that ESG funds are first obligated for the conversion.

Environmental Review Responsibilities

ESG activities are subject to environmental review by HUD under 24 CFR Part 50. The City of Dayton is responsible for supplying all available, relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR Part 50. The City of Dayton is also required to carry out mitigating measures required by HUD or select an alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

The City of Dayton and ESG subrecipients, including any contractors of subrecipients, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for an ESG project, or commit or expend HUD or local funds for eligible ESG activities, until HUD has performed an environmental review under 24 CFR Part 50. The City of Dayton must have received HUD approval of the property prior to any ESG activities beginning.

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Appendix C: Habitability Inspection Form

Appendix D: Rent Reasonableness Form

Appendix E: Rent Reasonableness Landlord/Property Manager Form

Appendix F: HMIS Release Form

**Appendix A: Dayton-Kettering-Montgomery County
Continuum of Care Coordinated Entry Policies and Procedures**

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**Appendix E: Rent Reasonableness Landlord/Property Manager
Form**

Appendix F: HMIS Release Form

Homeless Solutions Plan



A Blueprint for Ending
Chronic Homelessness
and Reducing Overall
Homelessness in
Dayton and Montgomery
County, OH

2006





Dear Community Member,

The Homeless Solutions Leadership Team is pleased to present the 10-Year Plan for Ending Chronic Homelessness and Reducing Overall Homelessness. The Plan's Findings and Recommendations were shaped by the involvement of a broad cross-section of the community that took part in interviews, surveys, work groups and focus groups, and facilitated discussions with the Leadership Team. Approximately 200 persons participated during the past two years, including current and formerly homeless persons, service providers, and representatives of community, business, health and human services, criminal justice and neighborhood organizations.

We have learned these facts about the people who are homeless in our community:

- More than 6,000 people experienced homelessness in Montgomery County during 2004. African-American residents experience disproportionately higher rates of homelessness than do Caucasian residents. A significant portion of the homeless population consists of children and teens under 18 years of age. Two-thirds of homeless persons are in families with children or are runaway youth between the ages of 11 and 17. The remainder are single men and women.
- The chronically homeless, defined as single adults with a disability who live on the street or in shelters for extended periods of time, make up only 6 percent of all homeless single adults in our community. However, their heavy use of shelters, emergency rooms, the Jail and other community services is very costly.

Homelessness is a moral and ethical challenge for our community. Our community will be judged by how it treats its most vulnerable residents. The community cannot allow our citizens to live on the street or in shelters. The toll that homelessness exacts on all of the people who experience it, especially children and teens, coupled with the negative impacts on neighborhood revitalization and economic development, is too great. The cost—in human and economic terms—is staggering.

The Homeless Solutions Leadership Team has developed its recommendations based on the following findings:

- Homelessness and poverty are inextricably connected.
- The role of housing in ending homelessness cannot be overstated.
- The solution to homelessness is bigger than the network of homeless providers.
- Homelessness affects our entire community and is not just a City of Dayton issue.

Changing the community conversation about homelessness will require educating and engaging the community about:

- 1) the realities that homeless adults, children and teens face on a daily basis; and
- 2) the importance of jointly constructing a road map that eliminates barriers and ensures better outcomes for all persons who are homeless in our community.

One of the key elements is increasing access to affordable quality housing for our lowest income residents. The development of this *10-Year Plan for Ending Chronic Homelessness and Reducing Overall Homelessness in Dayton & Montgomery County* was the first step in this process. The Plan is data-driven, based on best practice models, and challenges all of us to redirect our efforts from *managing* homelessness to working to *end* chronic homelessness and reduce overall homelessness. We urge you to review the Plan and join with us as we move into the implementation phase of this critical community initiative.

Sincerely,

Deborah A. Feldman Administrator Montgomery County <i>Homeless Solutions Leadership Team Co-Chair</i>	James T. Dinneen Former City Manager City of Dayton <i>Homeless Solutions Leadership Team Co-Chair</i>	Rashad M. Young Interim City Manager City of Dayton
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Special thanks to Kathleen Shanahan, whose
tireless efforts and dedication to the homeless
of our community, have been instrumental to
the development of this plan.



Executive Summary

A Blueprint for Ending Chronic Homelessness and Reducing Overall Homelessness in Dayton and Montgomery County, OH

People become homeless for different reasons, remain homeless for different lengths of time, and—if they are able to find a home—have different degrees of success in avoiding a return to homelessness. As a result, it is not surprising that there is no single response to homelessness and no simple solution. In fact, no public agency or system is charged by law with the responsibility for solving homelessness. Into this void have stepped a number of different programs and services, each usually directed at a limited part of the problem. Despite the best intentions of those involved, the net result of such an entrepreneurial approach has been a system that *manages* homelessness but doesn't *end* it.

This was the reality confronting the Homeless Solutions Leadership Team as it began its work in October, 2004. Convened by the City of Dayton and Montgomery County at the request of the Shelter Policy Board, and co-chaired by the Dayton City Manager and the Montgomery County Administrator, 20 community leaders from the fields of business, faith, healthcare, criminal justice, education, housing, mental health, social services, media, and philanthropy were charged with developing solutions to homelessness by working across organizational and jurisdictional boundaries. Bolstered by dozens of additional community members forming a number of work groups, and supported by staff from the City, the County, and the Shelter Policy Board, the

Homeless Solutions Leadership Team has now issued a call to action: *The Community 10-Year Plan for Ending Chronic Homelessness and Reducing Overall Homelessness*. Implementing the 10-Year Plan will be neither easy nor quick and will require commitment and leadership from every sector and quadrant of the county.

Dayton and Montgomery County join scores of other communities across the country being encouraged by the U.S. Department of Housing and Urban Development (HUD)—the nation's largest funder of services for the homeless—to develop and implement new ways of responding to this problem. HUD was inspired by the vision, first articulated by national advocacy groups, that chronic homelessness can be significantly reduced—or even ended—only if communities stop assuming that spending an ever-increasing amount of resources just to contain the problem is an acceptable way to operate. HUD calls such a paradigm shift an “essential element” for communities hoping to make significant progress in reducing chronic homelessness.

The Leadership Team's willingness to make this shift and to think differently about homelessness was fortified by a sobering review of local statistics generated by the Shelter Policy Board's Homeless Management Information System (HMIS). More than 6,000 people experienced homelessness in the county in 2004.

Although 70 percent of the homeless population is from Dayton, every other jurisdiction within Montgomery County was also identified as the last permanent address of someone who is homeless, meaning homelessness affects the entire community and is not just a City of Dayton issue. Well over half of the people who are homeless (61 percent) are families with children and another 5 percent are youth between the ages of 11 and 17. Because the vast majority of homeless families are single-parent families, this means that a startling proportion of homeless people are younger than 18. Beyond families and youth, the remaining one-third of homeless people are single adults, about 20 percent of whom are between 18 and 24. Most of the older homeless adults are male and have a high school diploma or GED; most of the younger homeless adults are female and do not have a high school diploma or GED. African-Americans are disproportionately represented in the homeless population, comprising over half.



Thinking differently about homelessness led the Leadership Team to consider all of the homeless, not just those whom HUD defines as chronically homeless, i.e., single adults with a disability (typically a serious mental illness and/or alcohol or drug addiction) who have been living on the street or in an emergency shelter for a year or longer or who have had multiple episodes of homelessness over a several year period. By some estimates only 6 percent of homeless single adults meet this definition locally. Responding to the chronically homeless demands much more than 6 percent of the available resources, so it is certainly important to address this population. However, the Leadership Team could not ignore the toll that homelessness exacts on all of the people who experience it, especially children. Therefore, it was unacceptable to mobilize the community to address only the needs of the chronically homeless without also addressing the needs of homeless youth, of families with children, and of singles without disabilities.

Thinking differently about homelessness also meant taking a critical look at how the existing spectrum of services is funded and how it operates. In Montgomery

County, 35 different funding sources provide nearly \$23 million annually either to prevent or to respond to homelessness. Most of the funding comes from public sources, with HUD alone accounting for 38 percent of the total. Less than one-third of the funding is from private sources, with a significant portion of the private funding coming from the faith community. Applying for and administering this money requires agencies to juggle multiple budgets and grant calendars and to comply with multiple sets of reporting requirements.

Perhaps the only thing more complicated than the funding mosaic is the maze that people must navigate as they try to prevent—or try to escape from—homelessness. A measure of this complexity is the fact that the Leadership Team created four Work Groups to help it understand how the system works. The “Closing the Front Door” Work Group was charged with developing a better understanding of efforts to *prevent* homelessness and identifying the policies or resource gaps

that contribute to homelessness. The “Shortening the Stay” Work Group was charged with developing a better understanding of the current system of shelters and services for people who become homeless and determining how the circumstances facing young adults, older adults, families with children, and youth who are on their own differ from each other. The “Opening the Back Door” Work Group was charged with determining how to provide affordable and supportive housing for people who *are* homeless as well as those *at risk* of homelessness. The Behavioral Health Work Group was charged with developing a better understanding of the publicly funded behavioral health system and how it “fits” with the homeless system, primarily focusing on homeless single adults with mental illness and/or substance abuse problems.

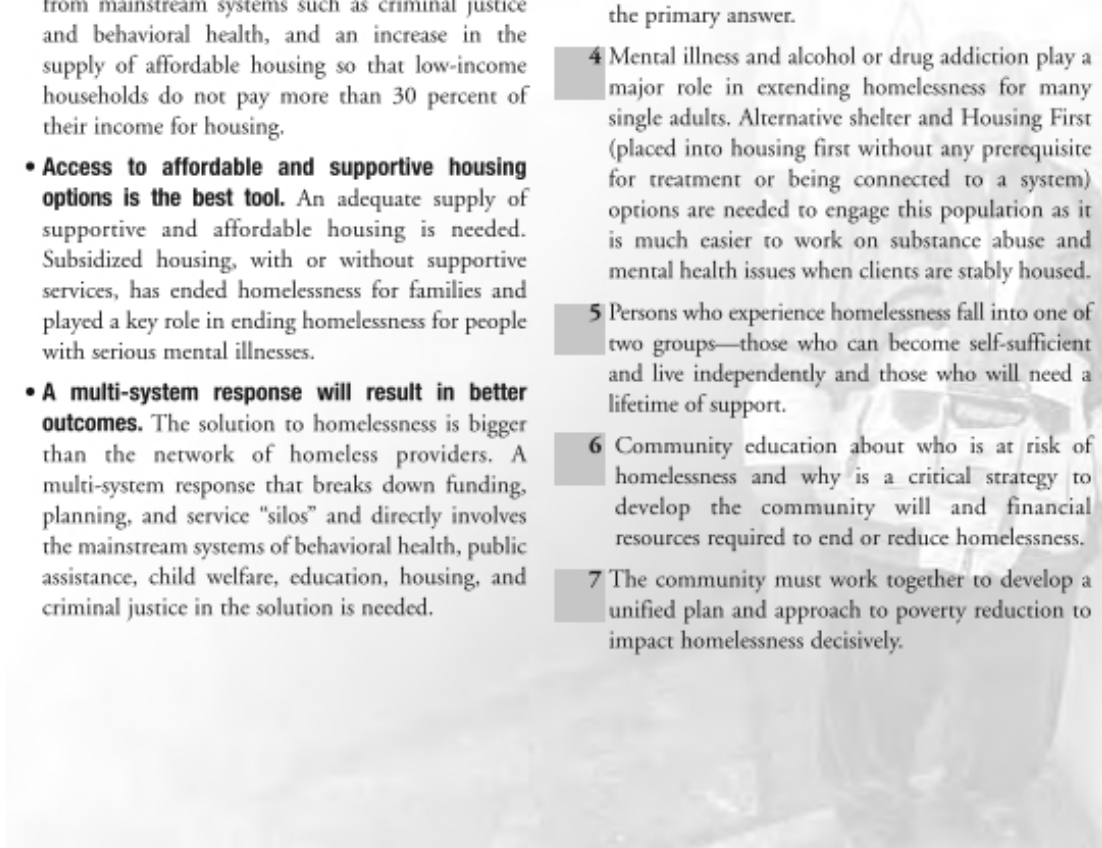
Having explored the maze confronting homeless people and those on the edge of homelessness, and having considered the challenges facing the agencies that serve all of them, the Work Groups were asked to identify key systemic or policy changes that would make an impact.

They were also asked to suggest some specific, fundable programs that would close the gaps in the existing network of services. As they deliberated, they drew from the best practices of other communities that are making great strides in their efforts to reduce homelessness. The Work Groups' detailed recommendations can be structured using four key principles as guidelines.

- **Homelessness and poverty are inextricably connected.** While homelessness has other contributing factors such as mental illness and substance abuse, poor people with these issues are much more likely to become homeless than persons with similar disabilities and a higher income.
- **Earlier intervention and prevention of homelessness are key.** Prevention strategies include short-term emergency assistance programs to help people maintain housing, housing placement as an integral part of discharge planning from mainstream systems such as criminal justice and behavioral health, and an increase in the supply of affordable housing so that low-income households do not pay more than 30 percent of their income for housing.
- **Access to affordable and supportive housing options is the best tool.** An adequate supply of supportive and affordable housing is needed. Subsidized housing, with or without supportive services, has ended homelessness for families and played a key role in ending homelessness for people with serious mental illnesses.
- **A multi-system response will result in better outcomes.** The solution to homelessness is bigger than the network of homeless providers. A multi-system response that breaks down funding, planning, and service "silos" and directly involves the mainstream systems of behavioral health, public assistance, child welfare, education, housing, and criminal justice in the solution is needed.

As the Leadership Team reflected on the body of data, research, best practices and recommendations produced by the Work Groups, the following conclusions emerged:

- 1 The community cannot afford to have people *living* on the street or in gateway shelters. The negative impact on people's lives, neighborhood revitalization, and economic development is too great. The cost—in human and economic terms—is staggering.
- 2 Homelessness affects the entire community and is not just a City of Dayton issue. Every jurisdiction in Montgomery County was identified as a last permanent address for one or more homeless persons in the HMIS, and every jurisdiction has a role to play in the solution.
- 3 The role of housing in ending homelessness cannot be overstated. Keeping people housed and rapidly re-housing those who become homeless is the primary answer.
- 4 Mental illness and alcohol or drug addiction play a major role in extending homelessness for many single adults. Alternative shelter and Housing First (placed into housing first without any prerequisite for treatment or being connected to a system) options are needed to engage this population as it is much easier to work on substance abuse and mental health issues when clients are stably housed.
- 5 Persons who experience homelessness fall into one of two groups—those who can become self-sufficient and live independently and those who will need a lifetime of support.
- 6 Community education about who is at risk of homelessness and why is a critical strategy to develop the community will and financial resources required to end or reduce homelessness.
- 7 The community must work together to develop a unified plan and approach to poverty reduction to impact homelessness decisively.



Committed leadership and strong governance are essential if the ambitious, multi-system response envisioned by the Work Groups is to be achieved. A Homeless Solutions Policy Board will be convened by the Dayton City Commission, the Montgomery County Board of Commissioners, and the United Way of the Greater Dayton Area to address the thorny issues of funding allocation and interagency coordination and to provide overall policy direction for the implementation of the 10-Year Plan. Establishing the Homeless Solutions Policy Board will be one of the first recommendations to be implemented. One of its early tasks will be to establish a Funders Collaborative to generate funds and set funding priorities. The Policy Board will also establish accountability and evaluation tools and take steps to strengthen the Homeless Management Information System's ability to support the homeless system. To minimize start-up time and costs, initial staffing will be provided through the Montgomery County Office of Family and Children First.

While there are more than 40 recommendations in the 10-Year Plan, of particular note are the plan's housing goals. The Plan calls for the development of a minimum of 1,800 units of affordable housing through a combination of new construction, rehabilitation of existing units, and rental subsidy. An additional 750 units of supportive housing will also be developed over the 10 years of the Plan's implementation.

Although the Leadership Team will forward the bulk of its recommendations to the Homeless Solutions Policy Board, some of them are so urgent that implementation has already begun. Foremost are some immediate and short-term strategies for shortening the length of stay that a homeless person faces in a gateway shelter and for addressing the impact that the density of gateway services (St. Vincent Hotel and The Other Place) has on the Patterson Boulevard corridor. In May 2006, Montgomery County made a significant commitment of Human Services Levy resources to allow the gateway agencies to begin to restructure their operations right away. Physical enhancements to their facilities and other operational improvements will continue through 2007.

Other key recommendations include strategies for developing an early warning system of sustained

prevention and intervention, developing shelter resources or Housing First programs for single young adults, implementing an eviction prevention program, increasing employment opportunities for homeless persons, increasing access to behavioral health services, and developing a coordinated case management system.

The Leadership Team is asking the community to commit human, financial, and political resources to end homelessness. Success will depend, in part, on identifying new financial resources and redirecting current resources toward supportive and affordable housing. Success will also depend on the willingness of providers to embrace new models of service provision targeted at ending rather than managing homelessness and on community leaders making the commitment to increase the supply of affordable and supportive housing all across Montgomery County.

The Homeless Solutions Leadership Team believes the community is up to the challenge. While it may not be possible to prevent all episodes of homelessness, it is possible to reduce significantly the numbers of people who experience homelessness and to ensure that *no one in our community* gets relegated to a life on the street.

For more information please contact:

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451 W. Third Street, 9th Floor
Dayton, Ohio 45422-3100
(937) 225-4695 Fax (937) 496-7714
Website: www.mcohio.org

City of Dayton
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101 W. Third St.
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www.cityofdayton.org



“Things need to move faster for homeless people. It took eight months to get me into a place. There aren’t enough places. I have had five case managers. You have five different people telling you five different things, and I fell through the cracks.”
—50-year-old formerly homeless man

Introduction

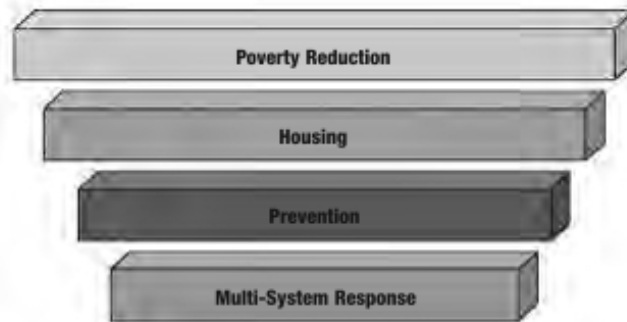
This statement, from a 50-year-old formerly homeless man, summarizes the current state of affairs for persons experiencing homelessness in Dayton and Montgomery County. The lack of affordable and supportive housing options, or the means to connect people rapidly to housing that does exist, creates a backlog throughout the system. As a result, too many people spend too much time *waiting* for an opening in the next phase of the continuum. The community’s day shelter, emergency overnight shelter, and healthcare clinic for the homeless all serve as gateways to the rest of the homeless continuum, meeting immediate crisis needs for shelter and healthcare, and making appropriate referrals to programmatic shelters, temporary supportive housing programs, or permanent housing. As a result of the logjam, the average length of stay at the gateways has nearly doubled from just over 30 days in 2001 to close to 60 days in 2005.

The opening quote also highlights another systemic issue—the lack of a coordinated case management system to help individuals and families efficiently navigate the homeless system. Today, individuals could indeed have five different case managers, either concurrently or sequentially, as they move from one agency or program to another. Possibilities include case managers in the homeless system, probation or parole officers, a mental health case manager, a child welfare case manager, and a Job and Family Services case worker.

Until recently, the problem of homelessness would undoubtedly have continued to suffer from benign neglect outside of the homeless provider community and a belief that more of the same—more beds, more shelters—was the answer. Slowly, a paradigm shift has occurred in the community. This shift is the result of the recognition that, while there has been an increase in the resources spent on homelessness, the number of persons experiencing homelessness has also continued to increase. By various estimates, the homeless population has increased by 13 percent to 20 percent during a time that the funding awarded to the community through the Continuum of Care process has nearly doubled. This clearly shows that instead of spending more money to *manage* homelessness, resources must be targeted to those strategies that will *end* homelessness. **There are four key principles that underlie the Dayton-Montgomery County 10-Year Plan to end homelessness.**



Key Principles To End Chronic Homelessness and Reduce Overall Homelessness



Poverty Reduction: Homelessness and Poverty are Inextricably Connected

- In Montgomery County, a full-time worker must earn \$11.44 per hour (approximately \$23,000 annually) or work 89 hours per week at minimum wage to afford a two-bedroom apartment. The Fair Market rent in Montgomery County for a two-bedroom apartment is \$595 per month (National Low Income Housing Coalition).
- More than half of all annual job openings in Montgomery County pay less than \$11/hour (Bureau of Labor Market Information, August 2003).
- More than 20,000 households in Montgomery County have incomes below \$10,000 (2000 Census).

Prevention: Earlier Intervention and Prevention are Key

- More than 12,000 very-low income renter households in Montgomery County pay more than 30 percent of their income for housing (2000 Census).
- There were 5,700 court-ordered evictions in Montgomery County in 2004. 501 were evictions from public housing. The estimated cost to shelter and re-house a family who enters the homeless system in Montgomery County is \$5,000. The average cost to prevent an eviction from public housing in Louisville, KY through the Louisville Eviction Prevention Program is \$445.
- Reorienting homelessness prevention from work with specific at-risk individuals to efforts to increase the supply of affordable housing and sustainable sources of livelihood will have a greater impact on overall numbers of persons experiencing homelessness (Shinn, Baumohl, and Hopper, 2001).



Housing: Access to Affordable and Supportive Housing Options is the Best Tool

- Homelessness could be ended for an estimated 20-30 percent of the persons who experience homelessness in Montgomery County with immediate access to affordable housing.
- Homelessness could be ended for an estimated 80 percent of persons experiencing chronic homelessness in Montgomery County with immediate access to permanent supportive housing through programs like Housing First.
- Housing stability is essential for successful treatment and/or recovery of homeless persons who are addicted to alcohol or drugs (Oakely and Dennis, *Homelessness in America*, 1996).

Multi-System Response: A Multi-System Response Will Result in Better Outcomes

- Insufficient income, mental illness, substance abuse, and domestic violence are some of the contributing factors to homelessness. A "one size fits all" response, focused primarily on the homeless providers, will not be successful.
- Homeless persons with a serious mental illness or addiction experience longer episodes of homelessness. Approximately 20-25 percent of the single adult homeless population has some form of severe and persistent mental illness. In Montgomery County, this percentage represents between 400 and 500 homeless adults (National Resource and Training Center on Homelessness and Mental Illness, 2003, National Low Income Housing Coalition).
- Compared to poor housed children, homeless children have worse health, more developmental delays, more anxiety, depression and behavior problems, and poorer school attendance and performance (Buckner, 2004; Shinn and Weitzman, 1996).

At varying levels of analysis, homelessness is a housing problem, an employment problem, a demographic problem, a problem of social disaffiliation, a mental health problem, a substance abuse problem, a family violence problem, a problem created by cutbacks in social welfare spending, a problem resulting from the decay of the traditional nuclear family, and a problem intimately connected to the recent increase in persons living below the poverty line, as well as others.

James Wright,
The Worthy and Unworthy Homeless, 1988



The Nature and Extent of Homelessness in Montgomery County

The same is true in Dayton and Montgomery County—there is no single cause of homelessness. Homelessness is, at some level, the failure of society and its mainstream systems to provide an adequate safety net. Insufficient income, mental illness, addiction, poor health, and domestic violence are some of the factors contributing to homelessness. Between 20-25 percent of homeless single adults have a serious mental illness; a high percentage of the remainder has general mental health issues.

Even with other contributing factors, at its core, homelessness is a poverty issue. Poor people who have a serious mental illness or addiction are at higher risk for homelessness than are people with those disabilities who are not poor. People living in poverty face difficult, if not impossible, choices between housing, healthcare, food, childcare, transportation, and other living expenses. They are often one family or financial crisis away from becoming homeless. Rent and utility arrearages, high medical bills, bad credit, inadequate income, and family conflicts can result in formal or informal evictions and homelessness.

Based on information collected from more than 3,500 homeless adults in 2005, 58 percent had no source of income. Sources of income that were identified are listed below. People were able to select more than one source of income.

• Public assistance	29%
• Disability income	24%
• Earned income	21%
• Retirement income	3%
• Other	16%

Thousands of people—men, women, and children—experience homelessness in Montgomery County every year. And they come from all quadrants of the County. While the majority of those who become homeless in Montgomery County were

LAST PERMANENT ADDRESS

- Montgomery County – 81%
 - City of Dayton – 86%
 - Suburban jurisdictions – 14%
- Greene, Preble, Darke, Miami, Clark, Warren counties – 4%
- Balance of State – 7%
- Outside Ohio – 8%
 - 40 other states identified

living in Dayton, every jurisdiction within Montgomery County has been identified as a last permanent address for people entering the homeless system. The Shelter Policy Board manages the implementation of the Dayton-Montgomery County Homeless Management Information System (HMIS), a database into which almost all of the community's emergency shelter, temporary supportive housing, and permanent supportive housing programs enter client data. The majority of clients in the HMIS had a last permanent address in Montgomery County (See Appendix J for a complete list of participating HMIS agencies).

Persons experiencing homelessness fall into one of four groups: single adults (ages 25+), families with children, single young adults (ages 18-24), and homeless youth (ages 11-17), with persons in families comprising the largest group. Family status is determined by who accompanied the individual when he/she came into contact with the homeless system. For example, adults who access the shelter system by themselves are considered to be unaccompanied or single adults, regardless of marital status or whether they have dependent children. Similarly, youth between the ages of 11-17 who are sheltered on their own are considered to be homeless youth.

Single adults make up one-third of the overall homeless population. The majority of this group is age 25 or older (82 percent), with just 18 percent of single adults falling between the ages of 18-24. Based on research in New York and Philadelphia, an estimated 10 percent of the adult homeless population can be considered chronically homeless. In Montgomery County, an estimated 6 percent of single homeless adults meet HUD's definition of chronic homelessness. Persons who are considered to be chronically homeless are single adults with a disability, most typically a serious mental illness and/or alcohol or drug addiction, who have been living on the street or in an emergency shelter for a year or longer or who have had multiple episodes of homelessness over a several year period.

Homelessness can be counted in two ways—over time and on a single night. **More than 6,000 people experienced homelessness in Montgomery County during 2004.**

◦ Single adults (age 25+)	27%
◦ Families with children	61%
◦ Single young adults (age 18-24)	7%
◦ Homeless youth (age 11-17)	5%

A point-in-time survey conducted on January 27, 2005 identified 581 persons living on the street or in an emergency shelter in Montgomery County. This number does not include

SINGLE ADULTS (25+)

- Much more likely to be male – 74%
- Slightly more likely to be African-American – 52%
- More likely to have at least a high school diploma or GED – 73%
- An estimated 100-150 adults are chronically homeless

Point-in-time count in January 2005: 339 adults (18+) in shelters or on the street

ADULTS IN FAMILIES

- Much more likely to be headed by an older adult (ages 25+) – 74%
- More likely to be African-American – 59%
- Adults ages 25+ are more likely to have at least a high school diploma or GED – 66%
- Young adults 18-24 are less likely to have at least a high school diploma or GED – 42%

Point-in-time count in January 2005: 89 families in shelters

HOMELESS YOUTH

- More likely to be female – 56%
- More likely to be African-American – 60%
- Highly likely to be between the ages of 13-17 – 95%
- Likely to be attending school – 68%

Point-in-time count in January 2005 identified 7 youth in shelter

SINGLE YOUNG ADULTS (18-24)

- More likely to be female – 60%
- More likely to be African-American – 63%
- Less likely to have at least a high school diploma or GED – 46%

those who experience homelessness but do not enter the homeless system, such as those who live precariously doubled up with family or friends.

Nationally, families with children comprise one of the fastest growing segments of the homeless population. Poverty and the lack of affordable housing are the principal causes of family homelessness (National Coalition for the Homeless). In Montgomery County, more than 1,100 families were identified as homeless during 2004. Nearly half of these families were never sheltered due to a lack of programmatic shelter beds.

There is no single predominant cause of homelessness among single adults. More than 2,000 single adults experienced homelessness in Montgomery County in 2004.

There were close to 500 young adults who experienced homelessness in Montgomery County in 2004. Young adults who experience homelessness are caught between the youth and adult homeless systems – too old for the former, yet not entirely appropriate for the adult system. These young adults have unique developmental needs and can too easily become acclimated into a culture of homelessness in the adult system. A limited number of 18-year olds are able to receive shelter through the single youth shelter in Montgomery County.

Family conflict is the primary reason homeless youth enter a shelter. Almost 300 homeless youth were sheltered in 2004. Many of these youth are also involved with the child welfare system. Most youth stay in shelter for one week or less and are reunited with their families upon exiting the shelter.

The Cost of Chronic Homelessness

Chronically homeless individuals are often caught in a revolving door, shuttling back and forth between expensive crisis and treatment services such as hospital emergency rooms, jail, substance abuse treatment, or crisis psychiatric services and the street or emergency shelter. A limited but growing body of research suggests that stabilizing individuals in supportive housing can reduce their use of expensive crisis service (Corporation for Supportive Housing). Local examples show similar results.

A case study was compiled on “Mr. J” in early 2005 as part of the Homeless Solutions planning process. Mr. J, a single male in his mid 40s, has been homeless off and on since 1992. He has a diagnosis of Schizo-affective disorder and depression and a long history of using drugs and alcohol. Mr. J also has a long history of asthma and hypertension—two chronic health problems that can be easily managed for people with a stable home. Mr. J. has no criminal history. A chronology of service from April 2004—January 2005 identified a partial cost to the community of more than \$56,000. This cost includes several hospitalizations at Good Samaritan Hospital, substance abuse treatment, and shelter. It excludes costs incurred by Grandview Medical Center, Miami Valley Hospital, Samaritan Behavioral Health Crisis Care Program, Nova House, and additional services that were not tracked by case managers.

The second example demonstrates both the high cost of chronic homelessness and the success of supportive housing in reducing those costs and preventing a return to the streets. Cobblegate, the community's first Housing First program, opened in September 2004 with a 10-unit apartment building. The program provides supportive housing to homeless mentally ill men and women who were not linked with the public mental health system. The average length of homelessness for the original 10 tenants was close to four years. All the tenants had a history of substance abuse and many also had serious medical issues. Seven of the 10 original tenants remain housed.



Five of the tenants who remained housed self-reported shelter episodes, incarceration, emergency room usage, in-patient hospital days, nursing home stays and inpatient residential treatment in the 12 months prior to housing. The cost for the 12-month period was estimated at \$370,354 (\$203 per day per person). The initial cost to provide supportive housing to these five tenants for one year was less than half that cost, \$155,125 (\$85/day per person for housing and services).

While chronically homeless individuals create a significant cost to some of the community's institutions such as hospitals and the Jail, there is also a cost to provide the permanent supportive housing that will enable these individuals to leave a life on the street. The cost differential between doing nothing and stabilizing individuals in supportive housing will not always be as dramatic as that found at Cobblegate. Research co-sponsored by the Corporation for Supportive Housing shows that providing supportive housing for homeless people with severe mental disabilities does reduce the usage and cost of additional crisis services (e.g., shelter use, hospitalizations, length of stay per hospitalization, and time incarcerated). At the same time, use of ongoing community services to address physical or behavioral health concerns is likely to increase. Even in instances where the cost of providing supportive housing may be close to or equal the reduction in crisis costs, the non-financial benefits – the societal and human rewards – tip the scales in favor of investing in supportive housing. The challenge is to find a way to connect the savings from lower use of crisis/ treatment services to offset the cost of developing and operating new permanent supportive housing.





The 20-member Leadership Team was composed of community leaders from:

- business
- faith
- healthcare
- criminal justice
- education
- housing
- mental health
- media
- philanthropy

An interagency staff team, composed of upper-level staff from Montgomery County, the City of Dayton, and the Shelter Policy Board, worked cooperatively to support the planning process.

The Planning Process

In the spring of 2004, the Shelter Policy Board created an action plan for developing a 10-year plan to end chronic homelessness and reduce overall homelessness in Dayton and Montgomery County. Inspired in part by the national goal to end chronic homelessness first articulated by the National Alliance to End Homelessness and later adopted by the U.S. Department of Housing and Urban Development (HUD) and the newly reconstituted Interagency Council on Homelessness (ICH) the planning process was unanimously endorsed by the City of Dayton Commission and the Board of Montgomery County Commissioners.

A Homeless Solutions Leadership Team was convened to lead the planning process. Co-chaired by the Montgomery County Administrator and the Dayton City Manager, the process was designed to develop solutions to homelessness by working across organizational and jurisdictional boundaries.

A key decision was made up front to broaden the focus of the plan beyond chronic homelessness. Given that the majority of the homeless in Montgomery County are in families, it was unacceptable to all involved to galvanize the community energy and resources needed to end homelessness for a small percentage of individuals without also working to solve homelessness for families and/or singles without disabilities. While only a small percentage of homeless individuals are considered chronically homeless, this group presents a two-fold challenge to communities. Chronically homeless individuals use significantly more than their “share” of existing shelter and other high-cost services such as jail, emergency rooms, and psychiatric beds. In addition, chronically homeless individuals are often the most public or visible face of homelessness in downtowns and on street corners and can negatively impact economic and neighborhood development efforts.

Unlike other social service systems such as child welfare and mental health, no organization has a legal mandate to solve homelessness. This has led to an entrepreneurial approach to the issue, with various faith-based and secular nonprofits stepping up to fill the void and address ever-growing needs. What has often been missing is strong community leadership and broad governmental and business support.

The recognition by providers and community leaders that a paradigm shift was needed was critical. The solution could not just be to do more of the same and expect different results. The five most important elements of success that have been identified in communities that have seen a reduction in chronic homelessness are:

1. Creating a **paradigm shift that recognizes existing approaches are not reducing or ending homelessness**, particularly chronic homelessness;
2. Setting a **clear goal of reducing chronic street homelessness**;
3. Committing to a **community-wide level of organization**;
4. Having **leadership and an effective organizational structure**; and
5. Having **significant resources from mainstream public agencies** that go well beyond homeless-specific funding sources.

(Strategies for Reducing Chronic Street Homelessness, January 2004)

On October 14, 2004, the City of Dayton and Montgomery County formally kicked-off the planning process with a community meeting. Both the Mayor of Dayton and the President of the Montgomery County Commission spoke passionately about the need for a community-wide process to develop solutions to homelessness. Phil Mangano, Executive Director of the Interagency Council on Homelessness, gave a keynote address that challenged the community to live up to its history of innovation and invention. "Dayton is well positioned to make a national impact, not only by virtue of your size and innovative legacy, but also because of the political and good will your mayor, county administrator, city manager, and community are extending. The Leadership Council you crafted is expansive and inclusive. With representatives from the business community, the public sector, media, the faith-based community, the United Way, and others, you have assembled a 'can do' council in the great tradition of your city," indicated Director Mangano.

The Homeless Solutions Leadership Team established outcomes for the process. As a community, we will be successful if we have:

- **Closed the front door** to keep more individuals and families housed and prevent their entry into the homeless system;
- **Opened the back door** to quickly re-house those individuals and families who do become homeless into safe, affordable housing in the community;
- **Rebuilt the infrastructure** of housing, income and services that supports poor people;
- **Ensured an efficient and coordinated system** of services; and
- **Educated the community** about the causes of homelessness **and changed attitudes and stereotypes** about persons who experience homelessness.



“I’m not bad; I just couldn’t get along with my step dad. He made my mom choose. She did and I lost.”

—19-year-old male

“Drugs, jail sentences, prison, probation. I had no stability.”

—46-year-old female

“My mom moved from place to place. She could never keep us in a house. We moved all of our lives. Never staying put anywhere.”

—19-year-old female

Data Collection

What Consumers Had to Say

In the summer and fall of 2004, 41 homeless and formerly homeless adults were asked directly for their perspective on and experiences with the services and programs they encountered while homeless—those that made a difference in helping them find and maintain housing and those that didn’t. Persons who were interviewed included people who were currently homeless, living on the street or in emergency shelters or temporary supportive housing programs, and formerly homeless individuals now living in permanent housing.

The interview results provide a glimpse into the lives and experiences of these 41 individuals. Key interview findings validated what was already known anecdotally: a majority of homeless persons interviewed have experienced violence in their lives; homeless persons have needs beyond just housing; there are many pathways into homelessness and usually it is a diversity of contributing factors rather than a single cause; and comprehensive case management is often the key to success. With the multiplicity of paths into homelessness, the research suggests that a one-size-fits all response will not be effective (See Appendix C for summary results of the interviews).

What Community Stakeholders Had to Say

Additional feedback came from surveys of community stakeholders and providers of shelter, housing, and other services. Both surveys rated the quality and availability of existing services, identified the systemic changes in policy or practice that would have the greatest impact on preventing or shortening stays of homelessness, and noted the most important issues for the planning process to address. The stakeholder survey was distributed to representatives of the business community, the faith community, neighborhood groups, school districts, criminal justice, all jurisdictions within the county, housing developers, local foundations and other funders. Over half of the respondents believed that homelessness is a serious problem in the Dayton and Montgomery County area. However, more than 60 percent did not feel homelessness was a problem in the community where they lived.

A majority of the respondents to the provider survey rated as good or excellent the quality of services available in the community but only a few of those services received the same high rating for availability. The top issues identified were the lack of available, affordable housing and the need to resolve more effectively the mental health issues that contribute to homelessness (See Appendix C for a summary of survey results).

The SWOT Analysis

Between February and April 2005, the Homeless Solutions Leadership Team held a series of joint meetings with providers of shelter, housing, and other services. The result was an analysis of the most critical **S**trengths, **W**eaknesses, **O**pportunities, and **T**hreats (SWOT) to the current homeless system. Also developed was a list of the “tough” questions that needed to be addressed during the planning process

to keep the focus on ending rather than managing homelessness. The top issues prioritized through the SWOT analysis follow (See Appendix C for more detailed results of the SWOT analysis).

- **Opportunity** to realign the overall system and construct a system that truly interconnects all of the providers;
- **Strength and opportunity** of a strong sense of cooperation among systems—between government and providers, among providers, between the City of Dayton and Montgomery County;
- **Weakness and threat** of an inadequate supply of safe, affordable housing;
- **Threat** of the failure to resolve underlying causes of homelessness and address impact of other mainstream systems on homelessness;
- **Threat** of major decreases in funding for programs and services for very-low income individuals; and
- **Weakness** of restrictions on how housing and service dollars can be spent.



How Persons Experiencing Homelessness Access & Move through the System

The movement through the system of three distinct groups of homeless persons (young adults, families, chronically homeless adults) was mapped to determine how well the current array of housing and services matches the needs of homeless persons and to identify the “clogs” that are creating barriers to preventing or ending homelessness. Flow charts were developed in conjunction with the providers and present a good picture of the complexity faced by those persons in each category who move, or try to move, through the homeless system and into housing (See Appendix B).

While the current system is more responsive to young adults and families, that is not the case for individuals who are chronically homeless. The system is not designed to end homelessness for this group of individuals, who tend to get “stuck” at the front end, rarely making it beyond contact with an outreach worker or a gateway shelter. Development of these flow charts underscored the need for more Housing First options in the community, thereby allowing these individuals to bypass the homeless system and move directly into permanent housing with appropriate wrap-around services.



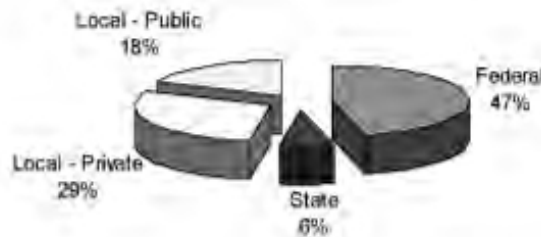
HOMELESS FUNDING

- Funding for homeless services comes predominantly from public sources, with private sources contributing less than one third of the total.
- The faith community contributes a significant portion of the private funding.
- The system is very HUD-dependent—38% of the total comes from HUD.
- Agencies are juggling multiple funders, budget and grant cycles, and reporting requirements—35 different funding sources were identified.
- Approximately one third of the total is spent on temporary or permanent supportive housing; another quarter is targeted to outreach or emergency shelters.

Where the Money is Going

The next step was to develop a better understanding of the flow of dollars through the homeless system. A detailed financial overview was constructed of the financial resources targeted to homelessness in Montgomery County, broken down by part of the continuum—prevention, outreach, emergency shelter, temporary supportive housing, permanent supportive housing, substance abuse treatment, mental health treatment, and other supportive services including child care, health care, employment assistance, and housing relocation. The financial overview was accompanied with programmatic detail on staffing and service coverage. Nearly \$23 million is spent on managing or preventing homelessness in Montgomery County annually. Agencies and programs included in the overview ranged from those who serve only homeless individuals or families to those serving only a small percentage (less than 10 percent) of homeless persons (The complete financial overview is included in Appendix D).

Homeless Funding by Primary Source



Homeless System Funding by Part of the Continuum

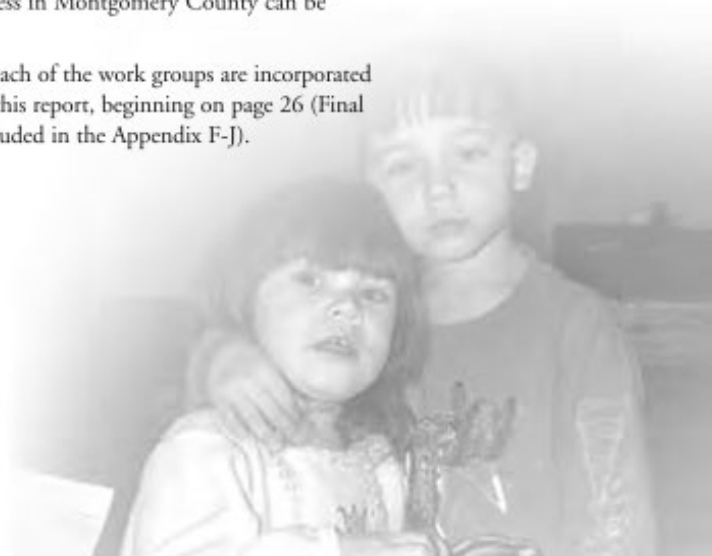




Developing the Strategies

Armed with the results of the data collection and analysis, the Leadership Team convened four community work groups to develop the systems change strategies and new initiatives needed to prevent homelessness and shorten the length of time persons experience homelessness. The work groups focused on two things: a **systems change agenda**, the two or three systemic or policy changes that would make an impact, and **closing the gaps**, the specific, fundable programs that would fill holes in the continuum. As an integral part of developing a set of recommendations, staff and the work groups identified best practices from communities across the country that have already developed 10-year plans to end chronic homelessness and are in varying stages of implementation. These best practices include programs and policies that have made a difference in the areas of prevention, shelter and services, housing, and behavioral health for those who are homeless or at-risk of homelessness (The practices with the best chance for success in Montgomery County can be found in Appendix E).

Strategies for ending homelessness from each of the work groups are incorporated into the overall recommendations section of this report, beginning on page 26 (Final reports from each of the work groups are included in the Appendix F-J).



Homeless Solutions Work Groups

HOMELESS SOLUTIONS LEADERSHIP TEAM

Deborah Feldman—Co-Chair | James Dinneen—Co-Chair

BEHAVIORAL HEALTH

Chair: Rebecca Lee
Staff: Geraldine Pegues

Purpose:

Develop a better understanding of the publicly funded behavioral health network and how it “fits” with the homeless system.

Determine how the behavioral health network can effectively support the community’s plans to solve the problem of homelessness.

Research best practice models from other communities regarding how the provision of mental health and substance abuse services are being used to prevent homelessness; shorten the length of time people are homeless; and, how behavioral health services are connected to permanent supportive housing.

CLOSING THE FRONT DOOR

Chair: Marc Levy
Staff: Kathy Emery

Purpose:

Develop a better understanding of the current network of services being used to prevent homelessness, as well as the discharge policies and practices in the criminal justice, mental health, child welfare, and health care systems serving our community.

Determine if the existing prevention services network and current discharge practices effectively support the community’s plans for solving the problem of homelessness.

Research best practice models underway in other communities that are effective in preventing homelessness and discharge policy and practices that ensure that people are not discharged from mainstream institutions into homelessness.

SHORTENING THE STAY

Chair: Brother Raymond Fitz
Staff: Kathleen Shanahan

Purpose:

Develop a better understanding of the current system of shelters and services targeted toward persons who become homeless.

Determine the mix of beds/units and services needed to shorten the length of time people experience homelessness, as well as how to best provide them.

Research best practice models from other communities regarding outreach, engagement, shelter and supportive services needed to transition people from homelessness to permanent housing.

OPENING THE BACK DOOR

Chair: Walt Hibner
Staff: Roberta Longfellow

Purpose:

Determine the type of permanent housing needed for each homeless subpopulation and the number of units needed for each group (e.g., affordable without supportive services, supportive housing, Housing First, etc.). Identify housing subsidy and financing resources. Research best practice models from other communities.

Develop a better understanding of zoning and regulatory barriers impeding the development of affordable and supportive housing.

WORK GROUPS—EXPECTED OUTCOMES:

Recommendations for policy guidelines and practices that could be changed to:

- Help solve homelessness
- Better prevent discharge into homelessness
- Shorten the length of time people experience homelessness
- Increase placement into permanent housing and aid the development of new housing

Recommendations for programs that could fill the gaps in our community's prevention efforts and in the continuum of services.

The **Behavioral Health Work Group** began by reviewing the public behavioral health system in Montgomery County, where mental health and substance abuse services are coordinated under one entity: the Alcohol, Drug Addiction, and Mental Health Services Board (ADAMHS). The work group focused its attention on homeless single adults with mental illness and/or substance abuse disabilities. The Work Group divided into two smaller groups to address the issues of mental health and substance abuse in more detail. Access to services, treatment models, outreach, and funding are some of the issues that were addressed by this work group.

After an initial review of the current array of prevention programs and the key issues to be addressed, the **Closing the Front Door Work Group** split into three subgroups. The first, People Living on the Edge, focused on very-low income families and individuals who are at risk of becoming homeless. The second group, Emancipating Youth, focused on low-income teens and young adults without the financial, social, educational or life skills to make a successful transition from adolescence to adulthood on their own. This group includes young adults who are emancipating from foster care, and "gapper" youth who don't qualify for ongoing protective care through either the mental health or developmental disability systems but who are too low-functioning to live on their own. The third group, Adult Re-entry, focused on adults re-entering the community from prison, mental health facilities or substance abuse treatment facilities.

The **Shortening the Stay Work Group** focused its attention on four distinct populations: homeless youth, families with children, young adults (ages 18-24), and older adults (25+), including those who are chronically homeless. While this group, too, believed that the best strategy for shortening the length of time people experience homelessness is through connection to affordable and supportive housing, strategies were also developed for improving service coordination and filling gaps in the existing continuum. The key is to reconnect people with housing rapidly. The longer people are homeless, the harder it is to reintegrate them back into mainstream society—habits needed to cope with homelessness are not necessarily suited to mainstream living.



“People who are homeless are people first. The fact that they have illnesses that may significantly disrupt their lives doesn’t diminish their rights, their responsibilities, or their dreams.”

—*Blueprint for Change: Ending Chronic Homelessness for Persons with Serious Mental Illness, Substance Abuse and Mental Health Services Administration*

The **Opening the Back Door Work Group** made a deliberate distinction between the housing needed for persons who experience homelessness and housing needed for those at risk of homelessness. Both groups need a better connection to decent, available housing units in the County. Many individuals who are currently homeless need housing with supportive services, either on a temporary or permanent basis. Additional affordable units, through rehabilitation, new construction or the provision of rental assistance, should be provided outside areas of current low-income concentration.

COLLECTIVELY, THE WORK GROUPS DETERMINED THAT:

- *preventing homelessness is far cheaper than allowing it—it costs less to keep someone in their current housing than it does to provide emergency shelter and to re-house them;*
- thousands of families and single individuals are “living on the edge” and are at-risk of becoming homeless;
- the safety net currently in place provides inconsistent coverage and is stretched very thin;
- very low-income households require deep subsidies in order to afford housing in the private market;
- there is no efficient, reliable way to connect affordable housing to the low-income people who need it, despite an abundance of vacant units;
- ensuring housing stability for young adults should be a high priority in order to prevent patterns and habits of chronic homelessness from developing;
- some homeless people are never successfully engaged by the existing set of shelter and service providers;
- current policies and procedures of many human service agencies sometimes make it difficult for homeless people who are in the system—or those at-risk of becoming homeless—to get all of the help they need and/or to get it quickly enough;
- homeless people needing mental health services are sometimes required to wait from two weeks up to three months;
- for people affected by drug or alcohol abuse, mental illness or other disabilities, local zoning laws, insufficient resources and the prevalence of the NIMBY syndrome (“not in MY backyard”) combine to produce a shortage of appropriate supportive housing options; and
- the NIMBY syndrome also complicates efforts to find locations for shelters and for affordable housing for low-income people.

Because committed leadership and strong governance of the system are fundamental requirements for successful implementation of the Homeless Solutions 10-Year Plan, the Leadership Team established a fifth, internal work group on governance. The **Governance Work Group** was charged with recommending an effective structure to provide policy direction, allocate funding, and coordinate local efforts to end chronic and reduce overall homelessness. Three models were examined: an informal collaborative model, a formal nonprofit model, and a governmental model. Leadership Team members visited Columbus to learn firsthand about the Community Shelter Board model of governance. Horace Sibley, the chair of the Atlanta Commission on Homelessness, visited Dayton to meet with the Leadership Team and share lessons learned from the development and initial implementation of Atlanta’s 10-Year Blueprint for Ending Homelessness.

Critical Issues

Resolving complex community issues requires the commitment and participation of key stakeholders, including those with competing interests. Bringing these competing interests to the same table results in a greater level of understanding among all involved and leads to better solutions. The work groups developed many excellent recommendations on the prevention of homelessness, improving services to move people out of homelessness, and governance of the homeless system. However, as the Work Groups drew to a close, it was clear that two issues remained as critical, yet unresolved, requiring the attention and focus of the Leadership Team as a whole – the role and future of public housing and gateway services.

Role and Future of Public Housing

Access to housing as the single most important factor in ending homelessness rose to the top in each of the four community work groups. As the largest single landlord of rental units for low-income households, the Dayton Metropolitan Housing Authority (DMHA) holds a unique place in Montgomery County. DMHA recognizes its role in housing the homeless by making this population its number one priority. DMHA is key to preventing homelessness for thousands of extremely low-income families in Montgomery County.

DMHA's Board of Housing Commissioners adopted a Strategic Plan in 2004 which will reduce the number of DMHA-owned public housing units over a ten-year period and increase the use of housing vouchers. The plan will provide for greater choice and improved housing quality for low-income families. The public housing sites identified for demolition were chosen based upon the density, condition and age of the structures. The Board of Housing Commissioners determined it necessary to make these tough decisions in order to provide decent, safe and sanitary affordable housing. This new strategy will enable resources to be directed toward the improvements of other remaining housing authority sites. In addition, maintaining a manageable size will enable the housing authority to provide better customer services and improve the quality of housing DMHA offers its clients.

Due to the high number of homeless families in Montgomery County, the decision to reduce public housing was difficult. It is important to note that the particular sites identified by the Board for demolition are obsolete, have the highest crime rate, and the highest rejection rate by all families looking for affordable housing in Montgomery County.

Through several presentations and staff participation on the Homeless Solutions Leadership Team, DMHA has helped the community understand why the Board made the decision to demolish targeted sites in our community. Although, the housing authority has chosen to reduce public housing units, the goal is to increase the ability to issue Section 8 vouchers throughout Montgomery County, resulting in an overall increase in the total number of families that the housing authority can serve. The goal of this restructuring is to ensure DMHA plays a leading role in the development of enhanced affordable housing in Montgomery County. This role is



described in more detail in the “Where We Go From Here” section of the report beginning on page 31.

DMHA at a Glance			
	Public Housing	Section 8 Vouchers	Total
Units/Vouchers in 2006	3,489	4,026	7,515
Units/Vouchers in 2010 (projected)	2,109	5,736	7,845
Average Cost per Month	\$386	\$365	
Budget shortfall per Month	\$95	--	
Average Family Size	2.1	2.7	
Average Annual Income	\$9,900	\$12,000	

Gateway Services

The final issue addressed by the Leadership Team was gateway services—the combination of day and night services needed to engage and assess homeless individuals and families and *quickly* connect them to appropriate housing and services from programmatic shelter to temporary supportive housing to permanent housing. The St. Vincent Hotel, the Samaritan Clinic for the Homeless, and The Other Place are the community’s gateway providers for homeless adults and families. The three facilities are located in close proximity to each other on the southern edge of downtown. There has been a great deal of debate about the clustering of the gateway providers in the same neighborhood and not always consensus about whether this is best for consumers or to what extent the clustering has resulted in an increase in crime or other negative impacts in the surrounding neighborhoods. There was consensus, however, that the issue of gateway services in all its complexity—what? where? how? targeted to whom?—is significant enough that it had to be resolved as a part of the Homeless Solutions planning process.

A small work group of Leadership Team members and gateway providers was convened to develop agreement on the best way to meet the dual goals of dramatically shortening the length of time spent in a gateway shelter to less than 14 days and reducing the impact on the neighborhoods surrounding the gateway shelters. Approximately 150-180 single adults have contact with the gateway providers on any given day. Of these, 60 are chronically homeless. Working with the gateway providers, staff developed the following breakdown of the pathways out of the gateway shelters for homeless adults.



Pathway out of Gateway	% of single adults for whom this is the best/most likely pathway	% of chronically homeless for whom this is the best/most likely pathway
Programmatic shelter	15%	0%
Treatment	10%	0%
Temporary supportive housing	20%	10%
Permanent supportive housing	30%	80%
Affordable housing/rental subsidy	20%	0%
Would remain homeless	5%	10%

More detail on the recommendations from the Gateway Work Group can be found in the “Where We Go from Here” section of the report, beginning on page 31.



Major Conclusions

1. **The community cannot afford to have people literally living on the street or in gateway shelters.** The negative impact on people's lives, neighborhood revitalization, and economic development is too great. The cost—in human and economic terms—is staggering.
2. **Homelessness is not just a City of Dayton issue.** Every jurisdiction in Montgomery County was identified as a last permanent address for one or more homeless persons in the HMIS, and every jurisdiction has a role to play in the solution.
3. **The role of housing in ending homelessness cannot be overstated.** Keeping people housed and rapidly re-housing those who become homeless is the primary answer.
4. **Mental illness and alcohol or drug addiction play a major role in extending homelessness for many single adults.** Alternative shelter and Housing First options are needed to engage this population as it is much easier to work on substance abuse and mental health issues when clients are stably housed.
5. **Persons who experience homelessness fall into two groups:** those who can become self-sufficient and live independently and those who will need a lifetime of support.
6. **Community education** about who is at risk of homelessness and why is a critical strategy to develop the community will and financial resources required to end or reduce homelessness.
7. **The community must work together** to develop a unified plan and approach to poverty reduction to impact homelessness decisively.



Recommendations

I. Poverty Reduction

Homelessness and poverty are inextricably connected. Poverty reduction strategies include those designed to get more money directly into the pockets of homeless persons and those that take a broader, more systemic approach to poverty reduction.

- a)** Improve access to benefits for persons who are eligible.
 - Establish an SSI (Supplemental Security Income) Outreach program of presumptive eligibility, similar to the Baltimore, Maryland model.
 - Advocate for a state-level, combined application process for SSI, SSDI (Social Security Disability), Medicaid and Food Stamps.
 - Determine eligibility for SSI or Medicaid for persons being released from prison so that benefits commence upon re-entry into the community.
- b)** Increase employment of homeless persons.
 - In collaboration with the Job Center, develop and implement flexible, longer-term training programs that also address life skills, job readiness, and job training.
 - Establish partnerships with employers to hire homeless persons.
 - Develop supportive employment programs targeted to persons in the gateway and programmatic shelters.
 - Explore Conservation Corps model for young adults.
- c)** Form an alliance of local and state public interest/policy groups to focus on homelessness and poverty reduction issues and advocate for policy and funding changes. Work toward a unified community plan and approach to poverty reduction.
- d)** Support the poverty reduction work already underway in the community, particularly through workforce development initiatives at the Job Center, EITC (earned income tax credit) outreach, and initiatives in the education and the behavioral health systems. Focus on those initiatives that reduce poverty by increasing an individual's skills and employability.

II. Prevention

Earlier intervention and prevention are key. Prevention strategies include short-term emergency assistance programs to help people maintain housing, housing placement as an integral part of discharge planning from mainstream systems (such as criminal justice and behavioral health), and an increase in the supply of affordable housing so that low-income households do not pay more than 30 percent of their income for housing.

a) Additional Housing Assistance for those at risk of Homelessness

- 1) Develop a minimum of 1,800 additional low-income housing units over a ten-year period through a combination of new construction, rehabilitation of existing units, and rental subsidy.
- 2) Preserve the current number of public and federally assisted housing units in Montgomery County, and secure the financing and rental subsidies necessary to replace in scattered sites *outside areas of concentration* the 1,000 – 1,500 units of public housing that will be demolished.
- 3) Support and strengthen efforts to develop a cross-jurisdictional rental rehabilitation program that would provide funding to rehab rental units that are cost-effective to repair and make them available to appropriate low-income households.
- 4) Advocate for the implementation of a County-wide Affordable Housing Implementation Plan, consistent with the community's Consolidated Plans, with incentives for jurisdictions to assist in the provision of affordable housing *outside areas of current concentrations*.
- 5) Provide gap financing or additional funding to complement the Low-Income Housing Tax Credit program to ensure that newly-constructed units are affordable to lower-income households.
- 6) Explore implementation of land use/zoning regulations requiring a percentage of new or rehabbed multi-family or single family units to be set aside as affordable units.



b) Emergency Assistance

- 1) Implement an eviction prevention program that includes financial and behavioral intervention, targeted to residents of public housing and Section 8 tenants, similar to a collaborative model in Louisville, KY.
- 2) Consolidate emergency financial assistance into a shared system of fund-raising, management and dispersal, with appropriate case management follow-up.
- 3) Develop an early warning system of sustained prevention and intervention resources that includes the development of an eviction database using the existing court records information system. Coordinate efforts with the 211-Hotline initiative led by United Way of the Greater Dayton Area and the Montgomery County Clerk of Courts.
- 4) Identify and resolve those discharge policies and practices from the criminal justice and behavioral health systems that lead to homelessness.

III. Housing

Access to affordable and supportive housing is the best tool for ending homelessness. Subsidized housing, with or without supportive services, has ended homelessness for families and played a key role in ending homelessness for people with serious mental illnesses. These housing strategies are targeted to persons who experience homelessness.

- a) Develop a minimum of 750 units of supportive housing over a ten-year period. Increase the level of supportive services provided to persons in permanent supportive housing.

Population	Temporary Supportive Housing	Permanent Supportive Housing			Total
	Moderate Services	Limited Services	Moderate Services	Intensive Services	
Young Adults 18-24	95	--	--	20	115
Single Adults 25+	60	75	150	75	360
Chronically Homeless	--	--	--	100	100
Families	75	--	100	--	175
Total	230	75	250	195	750

- b) Establish a Rental Assistance Subsidy program to provide temporary rental subsidy to homeless individuals and families moving into permanent housing.
- c) Implement a web-based Centralized Housing Locator System to connect potential tenants to vacant/available units.
- d) Implement a model of temporary supportive housing for homeless families sponsored by the faith community, similar to Bridge of Hope and Catholic Relief Refugee Resettlement.



Housing Summary

There are recommendations calling for the development of housing units in more than one section of this report. Units will be developed through a combination of new construction, rehabilitation of existing units, and rental subsidy. Some of the housing units are designed to prevent homelessness and others are targeted to persons who experience homelessness. The following table summarizes the total number of units to be developed during the implementation of the Homeless Solutions 10-year plan.



Shelter Beds	Temporary Supportive Housing	Permanent Supportive Housing	Affordable Housing w/out services	Rental Subsidy
50	230	520	1,800	To be determined

IV. Multi-System Service Response

The solution to homelessness is bigger than the network of homeless providers. A multi-system response that breaks down funding, planning, and service "silos" is needed. The mainstream systems of behavioral health, public assistance, child welfare, education, housing, and criminal justice must be directly involved in the solution.

a) Governance

- 1) Establish formal policy oversight of the homeless system through the creation of a Homeless Solutions Policy Board, convened initially by the Dayton City Commission, the Montgomery County Board of Commissioners, and the United Way of the Greater Dayton Area.

- 2) Establish a Funders Collaborative to provide formal fiscal oversight for all locally controlled and influenced resource decision-making in the homeless system.
- 3) Establish a Consumer Advisory Board to provide feedback and guidance on the implementation of the Homeless Solutions plan.
- 4) Establish a Provider Agency Directors Group to increase collaboration between provider agencies and identify policy issues and problems.
- 5) Implement strategic community education and advocacy program to support the implementation of the Homeless Solutions 10-Year Plan by conveying the message that homelessness is an issue that affects *everyone* and *everyone* is a stakeholder in resolving this issue.
 - Develop an advocacy program designed to provide a voice for the homeless.
 - Increase participation in homeless solutions by the suburban municipalities and townships.
 - Educate the community about the benefits of successful re-entry and the costs of failed re-entry from criminal justice and behavioral health facilities.
 - Educate the community about the importance of providing affordable housing throughout Montgomery County.
- 6) Implement a single Homeless Management Information System, flexible and robust enough to be a good Homeless Case Management System with participation from all homeless providers, emergency assistance providers, and other providers who also serve homeless persons.
- 7) Integrate the mainstream systems that have an impact on homelessness into the development and implementation of the solutions. Review policies and practices to identify and resolve those that create barriers for ending homelessness.
- 8) Recruit and coordinate volunteers from the faith and broader community.



b) Integrated Services

- 1) Co-locate CrisisCare staff at the Samaritan Healthcare Clinic to conduct Behavioral Health Assessments for general mental health, serious mental health and alcohol or drug abuse as needed.
- 2) Implement a Multi-Agency High Users team to identify and engage homeless persons who frequently access crisis services (Seattle's High Users of Crisis Public Services model).
- 3) Add a "homeless system" Family and Children First Council Service Broker to the group of Service Brokers from the large, publicly funded agencies to resolve issues of access and questions about practices or policies that impact homelessness.
- 4) Implement the Continuum of Care concept within the criminal justice system, with re-entry planning and support from adjudication through the first six months of re-entry.
- 5) Develop an interagency triage system for youth at risk of homelessness with

multiple points of access, including Department of Job and Family Services— Children Services Division, Alcohol, Drug Addiction and Mental Health Services Board, Board of Mental Retardation and Developmental Disabilities, Daybreak, and Juvenile Court.

- 6) Explore the creation of a homeless court designed to help homeless citizens resolve outstanding misdemeanor criminal warrants and ease court case processing backlogs (San Diego Homeless Court program).
- 7) Increase availability of alcohol and other drug treatment services.
- 8) Develop Mobile Outreach Teams to include members from multiple disciplines and expand availability of needed mental health services, including coverage beyond traditional business hours (Monday-Friday, 8:00 a.m. – 5:00 p.m.).

c) Homeless Services

- 1) Redesign gateway shelter services to reduce density and overall neighborhood impact.
- 2) Develop a replacement solution for the Red Cross family shelter at Parkside.
- 3) Explore development of a single entry point into the homeless system, with assessments provided on-site by CrisisCare staff for all adults who enter the homeless system.
- 4) Develop a better coordinated case management system, with a single case management system for the gateway shelters and client advocates who maintain contact and follow the client from entry into the homeless system through stabilization in permanent housing.
- 5) Strengthen connections with existing life skills and parenting programs.
- 6) Increase the number of programmatic shelter beds for single women from 7 to 15 beds.
- 7) Develop 15 units of Pre-Treatment Supportive Housing for homeless individuals who have been assessed by CrisisCare and are waiting to access substance abuse treatment.
- 8) Provide adequate healthcare services appropriate to the needs of homeless persons.
- 9) Develop shelter resources or Housing First programs for single young adults (age 18-24).
- 10) Develop a 25-30 bed, 24-hour alternative shelter for homeless persons who are actively using alcohol or drugs, similar to MaryHaven in Columbus, OH or the Healing Place in Louisville, KY.



Where We Go From Here

The report, in working draft form, was shared with providers, consumers, and community groups to get their input and begin to build consensus on the strategies needed to end chronic homelessness and reduce overall homelessness. Initial implementation will focus on priority recommendations in three critical areas: governance, gateway services, and housing.

Governance

One of the first orders of business in the summer of 2006 will be the establishment of a Homeless Solutions Policy Board (HSPB) to replace the Shelter Policy Board. The Homeless Solutions Policy Board will provide policy direction, allocate funding, and coordinate programs and projects.

The Homeless Solutions Policy Board will establish working committees and ad-hoc teams to assist with the implementation of the 10-Year Plan. Committee membership will include an effective mix of Policy Board members, policy makers, technical experts, and others with a vested interest in solving homelessness, including provider agencies. A Consumer Advisory Board will be established to provide direct feedback on the development and implementation of solutions to homelessness from the vantage point of individuals who have experienced homelessness firsthand. As a first step, focus groups were held with homeless and formerly homeless adults to obtain feedback on the recommendations. Their input and suggestions will be provided to the Policy Board.

Staffing of the Homeless Solutions Policy Board will be provided through the Montgomery County Office of Family and Children First. The use of an existing governmental organization for staff support will allow the new structure to “hit the ground running” and keep initial start-up costs low. The Office of Family and Children First will add key staff who will focus solely on homelessness, supported by existing overhead and support staff. An assessment will be made after some experience has been gained to determine if the staffing and operation should be spun-off from the Office of Family and Children First and, if so, its proper placement.

HOMELESS SOLUTIONS POLICY BOARD'S FOUR INITIAL FOCUS AREAS

1. Provide homeless system oversight and develop and implement strategic plans and policies to end chronic homelessness and reduce overall homelessness in Dayton and Montgomery County.
2. Establish a Funders Collaborative to generate funds and set funding priorities and criteria consistent with the Homeless Solutions 10-Year Plan and policy goals.
3. Ensure an effective management information system is in place to support the homeless system. Require all agencies in the homeless system network to participate through consistent data collection and data management to provide high quality data for planning, performance measurement, funding allocation, and accountability.
4. Establish clear outcome and accountability measures consistent with the strategic plans and policy goals. Use the management information system data and other evaluation tools to measure effectiveness and progress.

The Funders Collaborative called for in recommendation IV.A.2 above will be a subcommittee of the Homeless Solutions Policy Board, establishing formal fiscal oversight for all locally controlled and/or influenced resources targeted to the homeless system. The Funders Collaborative will ensure that funding criteria and decisions are made in alignment with the policies and outcomes established by the Homeless Solutions Policy Board. Proposed membership for each group follows.

Homeless Solutions Policy Board Proposed Membership	
Organization	Member
ADAMHS Board	ADAMHS Board Chair
At Large	Selected by HSPB
At Large	Selected by HSPB
Bank/Financial Institutions	Selected by HSPB
Business Community	Dayton Business Committee
Business Community	Downtown Dayton Partnership
Business Community	Dayton Urban League
Business Community	Dayton Area Chamber of Commerce
City of Dayton	City Manager
Consumer Representative	Formerly Homeless Individual(s)
Dayton Foundation	President/Designee
Dayton Metropolitan Housing Authority	DMHA Board Chair
Faith-Based Community	Selected by HSPB
Faith-Based Community	Selected by HSPB
Greater Dayton Real Estate Investors Association	Designee (GDREIA)
Human Services Levy	HSL Council Chair
Kettering Health Network	President/Designee
Area Foundations	Designee
Mayors and Managers	Chair/Designee
Montgomery County	County Administrator
Premier Health Network	President/Designee
Provider Agency Director Group	Designee
Sinclair Community College	President/Designee
United Way of the Greater Dayton Area	United Way Board Chair/Designee
University of Dayton	President/Designee
Wright State University	President/Designee
Funders Collaborative Proposed Membership	
Organization	Member
ADAMHS Board	ADAMHS Board Chair
City of Dayton	City Manager
Dayton Foundation	President/Designee
Dayton Metropolitan Housing Authority	DMHA Board Chair
Greater Dayton Area Hospital Association	President (GDAHA)
Human Services Levy	HSL Council Chair
Area Foundations	Designee
Montgomery County	County Administrator
United Way of the Greater Dayton Area	United Way Board Chair/Designee

Housing

A second, simultaneous task will be to immediately begin implementing some of the plan's key housing recommendations. As a result of its participation in the Homeless Solutions process, the Board of Housing Commissioners evaluated its Strategic Plan to identify opportunities for reuse of its facilities to help achieve the community's goal of ending chronic and reducing overall homelessness. Three sites have been identified to provide a combination of shelter, affordable, and permanent supportive housing for homeless individuals and families. Successful reuse of these sites will require a community partnership which includes the Dayton Metropolitan Housing Authority (DMHA), the City of Dayton, Montgomery County, and others. Financial resources must be identified to modernize and improve the facilities, provide funding for security, operating subsidy and social services at the targeted locations. Without adequate financial support from the community, these sites cannot be reused.

The site with the most immediate potential to break the logjam at the gateway shelters is the Helena Hi-Rise, which is currently slated for demolition. This facility could be converted to permanent supportive housing for homeless individuals. The adjacent property, Parkside Homes, is slated for demolition as well. In the event that redevelopment of the site would include Helena Hi-Rise in the total project, alternative options may need to be explored.

The two other DMHA sites that have been identified as potential solutions are Dunbar Manor and Hilltop Homes. Dunbar Manor could become the new home for the Sojourner program. The Red Cross Emergency Housing Program could relocate to Hilltop Homes once Parkside has been demolished.

Memorandums of Understanding for the Helena Hi-Rise facility, clearly detailing responsibilities and obligations of DMHA, The City of Dayton, Montgomery County and any other partners will need to be negotiated and signed before any reuse.

Gateway Services

The third implementation track will focus on the immediate and short-term strategies for shortening the stay in a gateway shelter to less than 14 days and reducing density and impact in the neighborhoods surrounding the gateways. While some of the recommendations are relatively minor and easy to accomplish, others are much more significant and will require both a shift in operations at the St. Vincent Hotel and The Other Place *and* community leadership and commitment for them to happen. Resolving the issues surrounding the Patterson Boulevard corridor where the gateway shelters are located is critical to the success of the overall Homeless Solutions 10-Year Plan and to the ongoing economic and neighborhood development in the area. Recognizing that, Montgomery County made a significant commitment of resources from the Human Services Levy in May 2006 to implement the immediate gateway strategies. Implementation of the short-term gateway strategies will require additional community resources.





Immediate Strategies (Spring 2006)

1. Convert the St. Vincent Hotel to a 24-hour family shelter, while continuing to shelter single adults overnight. Convert The Other Place into a singles-only daytime facility.
2. Extend the current operating hours at both the St. Vincent Hotel and The Other Place to eliminate gaps in coverage in the morning and early evening, thereby providing 24/7 gateway coverage for singles with the following hours:
 - The Other Place: 7:00 a.m. – 7:00 p.m.
 - St. Vincent Hotel: 6:30 p.m. – 7:30 a.m. (can return to the St. Vincent grounds at 6:00 p.m.)
3. Develop “peak hours” programming at The Other Place to encourage clients to remain indoors during morning and evening high traffic hours.
4. Keep “winter shelter” beds at the St. Vincent Hotel open year-round.
5. Install lockers at the St. Vincent Hotel for those guests who don’t have to make a reservation every day.
6. Work with House of Bread and other community and faith-based meal providers to provide lunch on-site for singles at The Other Place and families at the St. Vincent Hotel.
7. Reconfigure entry access to The Other Place using the side door (parking lot side) instead of the front door facing Patterson Boulevard.
8. Make an enclosed smoking area using The Other Place’s green space off Catherine Street.
9. Develop outdoor space at St. Vincent Hotel to include covered shelter areas, children’s playground equipment, basketball hoops (adult and child size), etc.
10. Strategically place City of Dayton police officers to reduce wandering/impact on neighborhood.

Short-Term Strategies (Next 18 months)

1. Develop 100 units of temporary and permanent supportive housing for homeless adults.
2. Provide rental subsidies to individuals who will move directly from the gateway into permanent housing.
3. Relocate The Other Place to another neighborhood.
4. Develop 24/7 intake and assessment access to homeless system.

Evaluation

Evaluation and performance measurement will be an integral part of implementation. Evaluation will provide an objective way to track progress toward meeting the goal of ending chronic homelessness and reducing overall homelessness. It will also keep the community focused on what is working well and where plans

may need to be modified. Action plans for each of the recommendations will be developed with benchmarks, outcomes measures, and responsible persons identified.

Indicators of success will include decreases in:

- the number of individuals who are chronically homeless;
- the average length of stay in the gateway shelters;
- the average length of stay in the homeless system; and
- the recidivism rate back into homelessness.

Other indicators of success will include increases in:

- housing stability (7+ months in permanent housing), and
- income from employment or benefits.

The Homeless Management Information System (HMIS) will be used to track key outcomes and enhance the community's understanding of the nature and extent of homelessness in Montgomery County. The HMIS currently is an underutilized resource, with much of its potential for making referrals and sharing data untapped. As implementation of the Homeless Solutions 10-Year Plan moves forward, the HMIS will be a key tool for measuring effective programs and enabling the Homeless Solutions Policy Board to make informed programming and funding decisions.

Conclusion: A Call to Action

The Homeless Solutions 10-Year Plan outlines ambitious goals to prevent homelessness in our community, complemented by strategies to assure the availability of safe affordable housing throughout the County by building on local, state, and national resources and best practices. Success will require commitment and leadership from all sectors and quadrants of the county—the City of Dayton and Montgomery County governments, suburban jurisdictions, neighborhoods, business, the faith community, social service providers, and consumers. Those experiencing homelessness have a personal responsibility to assist with the development and implementation of the solutions. The community has an equal obligation to provide the housing and services necessary to prevent homelessness and to assist those who become homeless to quickly make the transition from homelessness to housed.

It will be neither easy nor quick. The plan calls for human, financial, and political resources to be galvanized to end homelessness. Success will depend, in part, on identifying new financial resources and redirecting current resources toward supportive and affordable housing. Success will also depend on the willingness of providers to embrace new models of service provision targeted to ending rather than managing homelessness, and on community leaders making the commitment to increase the supply of affordable and supportive housing all across Montgomery County.

The Homeless Solutions Leadership Team believes the community is up to the challenge. While it may not be possible to prevent all episodes of homelessness, it is possible to reduce significantly the numbers of people who experience homelessness and to ensure that *no one in our community* gets relegated to a life on the street.



Appendices

Appendix A	Roster of Work Group Chairs and Members
Appendix B	Overview of the Current Homeless System and Other Background Material
Appendix C	Results from Interviews, Surveys, SWOT Analysis, and Focus Groups
Appendix D	Financial Overview of Current Homeless System
Appendix E	Best Practice Source Information
Appendix F	Behavioral Health Work Group Report
Appendix G	Closing the Front Door Work Group Report
Appendix H	Shortening the Stay Work Group Report
Appendix I	Opening the Back Door Work Group Report
Appendix J	Governance Work Group Report
Appendix K	Resolutions of Endorsement

All appendices are available on-line on the following websites:

City of Dayton www.cityofdayton.org

Montgomery County www.mcoho.org

United Way of the Greater Dayton Area www.dayton-unitedway.org

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Glossary

ADAMHS

The Alcohol, Drug Addiction and Mental Health Services Board for Montgomery County. Coordinates and funds mental health and substance abuse treatment services.

Affordable Housing

Housing is considered affordable when a tenant pays no more than 30 percent of his/her income for rent and utilities. Households earning less than 50 percent of the area median income (\$30,000 for a family of four) have the greatest need.

Chronically Homeless

A single, unaccompanied individual with a disability who has been homeless for more than one year or had at least four episodes of homelessness in the last three-years. The disability can be substance abuse, serious mental illness, developmental disability, or chronic physical illness.

Continuum of Care (CoC)

A collaborative funding approach that helps communities plan for and provide a full range of emergency, temporary, and permanent housing, along with supportive services, designed to assist homeless individuals and families to move to permanent housing.

Engagement Center

An alternative shelter targeted to homeless adults who are addicted to alcohol and/or drugs.

Gateway Shelter

The primary entry points into the homeless system, designed to meet immediate crisis needs for shelter and/or healthcare.

General Mental Health Disorder

The presence of a psychiatric disorder that is not usually accompanied by significant functional impairment or a disruption of normal life (i.e., depression, anxiety, etc.). Treatment is usually short term.

Homeless Management Information System (HMIS)

A computerized data collection system designed to capture client-level information over time on the characteristics and service needs of homeless men, women and children, while also protecting client confidentiality.

Housing First

Low-demand housing, generally targeted to chronically homeless adults who are mentally ill and/or addicted. Tenants are placed into housing directly from the street or a gateway shelter without a prerequisite that they successfully complete treatment or be connected to a mental health center.

Permanent Supportive Housing

Long-term, permanent housing with varying levels of supportive services. Targeted to homeless persons with disabilities, including serious mental illness, chronic substance abuse, or HIV/AIDS. There are many different models of permanent supportive housing.

Programmatic Shelter

A shelter that, by design, has a longer length of stay than a gateway shelter. Programmatic shelters provide more intensive case management services, life skills training, and connection to employment and other mainstream resources.

Safe Haven

A form of supportive housing serving hard-to-reach homeless persons with severe mental illness who are living on the streets and have been unwilling or unable to participate in supportive services.

Section 8 Housing Voucher

Federal rent subsidy that can be used by low-income households to lease privately owned housing throughout the community. The voucher program is administered by the public housing authority.

Serious Mental Health Disorder

The presence of a severe psychiatric disorder accompanied by significant functional impairment, disruption of normal life tasks, periods of hospitalization, and need for psychotropic medication (i.e., psychosis, schizophrenia, etc.).

Shelter Policy Board

The collaborative board created by Montgomery County, City of Dayton, United Way of the Greater Dayton Area and the ADAMHS Board of Montgomery County in 1986 to serve as the coordinating oversight body for the homeless system.

Substance Abuse Disorder

Excessive, compulsive drinking of alcohol and/or physical dependence on drugs resulting in a chronic disorder affecting physical health and/or personal or social functioning.

Temporary Supportive Housing

Housing combined with supportive services on a temporary basis. Sometimes referred to as transitional housing, residents can stay for up to two years while they acquire the independent living and job skills needed to obtain and maintain permanent housing. There are many different models of temporary supportive housing.

Notes



Notes



The following is an abridged version of the Homeless Solutions Community 10-Year Plan. The full report (containing the Appendices A - K referenced in the text) is available by contacting:

**Montgomery County
Office of Family and Children First**
451 W. Third Street, 9th Floor
Dayton, Ohio 45422-3100
(937) 225-4695 Fax (937) 496-7714
www.mcoho.org

**City of Dayton
Department of Planning
and Community Development**
101 W. Third St.
Dayton, Ohio 45402
(937) 333-3670 Fax (937) 333-4281
www.cityofdayton.org

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Grantee SF-424's and Certification(s)



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www.daytonohio.gov

August 15, 2024

Matthew LaMantia
Acting Director, Community Planning and
Development Columbus Field Office
U.S. Department of Housing and Urban
Development 200 North High Street
Columbus, Ohio 45315-2499

Re: 2024 Action Plan Certifications and Forms

Dear Mr. LaMantia:

The City of Dayton's 2024 Action Plan has been submitted through IDIS On-Line. Enclosed please find the executed certifications and SF-424 forms for the 2024 Community Development Block Grant (CDBG) Program, the 2024 Emergency Solutions Grant (ESG) Program, and the 2024 HOME Investment Partnerships (HOME) Program. The City of Dayton's program year for the use of 2024 HUD entitlement grant funds is January 1, 2024, to December 31, 2024.

Should you have any questions or require additional information, please contact Sarah Gelst, Community Development Manager, at (937) 333-3814.

Sincerely,

A handwritten signature in cursive script that reads "Shelley Dickstein".

Shelley Dickstein
City Manager

Application for Federal Assistance SF-424	
* 1. Type of Submission: <input type="checkbox"/> Preproposal <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application	
* 2. Type of Application: * If Revision, select appropriate letter(s). <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	
* 3. Date Received: 01/15/2024 4. Applicant Identifier: City of Dayton	
5a. Federal Entity Identifier: 01-C000173 5b. Federal Award Identifier:	
State Use Only: 6. Date Received by State: <input type="text"/> 7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION: * 8. Legal Name: City of Dayton	
* 9. Employer/Taxpayer Identification Number (EIN/TIN): 016000173 * 9. USE: P03RFFDFQK3	
d. Address: * Street: 101 W. Third Street Street: * City: DAYTON County/Parish: * State: OH: Ohio Province: * Country: USA: UNITED STATES * Zip / Postal Code: 45401-0000	
e. Organizational Unit: Department Name: Planning, Neighborhoods, & Dev Division Name: Community Development	
f. Name and contact information of person to be contacted on matters involving this application: Prefix: * First Name: Sarah Middle Name: J. * Last Name: Seis: Suffix: Title: Community Development Manager	
Organizational Affiliation: * Telephone Number: 937-233-3304 Fax Number: 937-233-4281 * Email: sarah.seis@daytonohio.gov	

Application for Federal Assistance SF-424	
* 8. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/>	
Type of Applicant 2: Select Applicant Type <input type="text"/>	
Type of Applicant 3: Select Applicant Type <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="4.912"/>	
CFDA Title: <input type="text" value="Community Development Block Grant/Entitlement Grant"/>	
* 12. Funding Opportunity Number: <input type="text" value="R-19-07-09-0010"/>	
* Title: <input type="text" value="2024 Community Development Block Grant/Entitlement Grant"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> Add Attachment Delete Attachment View Attachment </div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="City of Hylon 2024 CDBG Program"/>	
Attach supporting documents as specified in agency instructions. <div style="display: flex; justify-content: space-around;"> Add Attachments Delete Attachments View Attachments </div>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="5,475,181.00"/>
* b. Applicant	<input type="text" value="5,500,000.00"/>
* c. State	<input type="text" value="421,000.00"/>
* d. Local	<input type="text" value="104,814.00"/>
* e. Other	<input type="text" value="101,162.00"/>
* f. Program Income	<input type="text" value="35,400.00"/>
* g. TOTAL	<input type="text" value="10,259,557.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

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)**

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: Mr. * First Name: Last Name: Middle Name: Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0069
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

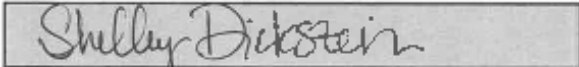
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 18 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1581-1583 and 1585-1586), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-87)
Prescribed by OMB Circular A-112

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§ 1501-1508 and 5324-5325) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§ 276a to 276e-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. § 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-224) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11893; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§ 7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 108 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470), EO 11693 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§ 469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Dayton	05/15/2024

SF-424D (Rev. 7-87) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Free Application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate effect(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: 08/15/2024	4. Applicant Identifier City of Dayton	
5a. Federal Entity Identifier: 31-8000175	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Applicable Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="City of Dayton"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 316030175	* c. UEI: E53069XUJG87	
d. Address:		
* Street1: <input type="text" value="101 W. Third Street"/>	Street2: <input type="text"/>	
* City: <input type="text" value="Dayton"/>	County/Parish: <input type="text"/>	
* State: <input type="text" value="OH"/>	Province: <input type="text"/>	
* Country: <input type="text" value="USA - UNITED STATES"/>	* Zip / Postal Code: <input type="text" value="45401-0022"/>	
e. Organizational Unit:		
Department Name: <input type="text" value="Planning, Budgeting, & Gen"/>	Division Name: <input type="text" value="Community Development"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text" value="Sarah"/>	
Middle Name: <input type="text" value="A"/>	* Last Name: <input type="text"/>	
* First Name: <input type="text" value="Sarah"/>	* Last Name: <input type="text"/>	
Suffix: <input type="text"/>	Title: <input type="text" value="Community Development Manager"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="937-333-2924"/>	* Fax Number: <input type="text" value="937-333-3261"/>	
* Email: <input type="text" value="Sarah.Weis@cityofdayton.ohio.gov"/>		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="C: City or Township Government"/>	
Type of Applicant 2: Select Applicant Type: <input type="text"/>	
Type of Applicant 3: Select Applicant Type: <input type="text"/>	
* Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. Department of Housing and Urban Development"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.231"/>	
CFDA Title: <input type="text" value="Emergency Solutions Grant Program"/>	
* 12. Funding Opportunity Number: <input type="text" value="E-24-HI-39-0310"/>	
* Title: <input type="text" value="2024 Emergency Solutions Grant Program"/>	
13. Competition Identification Number: <input type="text"/>	
Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="City of Dayton 2024 ESG Program"/>	
Attach supporting documents as specified in agency instructions <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <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: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed

17. Proposed Project:
 * a. Start Date: * b. End Date:

18. Estimated Funding (\$):


* a. Federal	501,473.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	5,195,970.00
* f. Program Income	0.00
* g. TOTAL	5,702,640.00

*** 19. Is Application Subject to Review By State Under Executive Order 12872 Process?**
 a. This application was made available to the State under the Executive Order 12872 Process for review on
 b. Program is subject to E.O. 12872 but has not been selected by the State for review.
 c. Program is not covered by E.O. 12872

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**
 Yes No
 If "Yes", provide explanation and attach

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 I'll 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)
 I AGREE
 ** The list of certifications and responses on an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Name: * First Name:
 Middle Name:
 Last Name:
 Suffix:
 Title:
 Telephone Number: Fax Number:
 Email:
 * Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4041-0015
 Expiration Date: 02/29/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

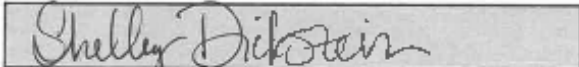
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site, to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 18 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1683-1586) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107) which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290dd-3 and 290ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§801 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424C (Rev. 7-97)
 Prescribed by OMB Circular A-107

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874) and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction agreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11650; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470); EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-4 et seq.)
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1986 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Dayton	03/10/2024

SF 424D (Rev. 7-97) Blank

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

Application for Federal Assistance SF-424	
<p>* 8. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="City or Township Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>* 11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.255"/> <p>CFDA Title</p> <input type="text" value="HUD Investment Partnerships Program"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="H-24-06-56 CROs"/> <p>* Title:</p> <input type="text" value="2024 HUD Investment Partnerships Program"/>	
<p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/>	
<p>14. Areas Affected by Project (City, County, State, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachment"/> <input type="button" value="Undo Attachment"/> <input type="button" value="View Attachment"/> </div>	
<p>* 16. Descriptive Title of Applicant's Project</p> <input type="text" value="City of Dayton 2024 RMA Program"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <div style="display: flex; justify-content: space-around;"> <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 * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,151,850.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="1,350,450.00"/>
* d. Local	<input type="text" value="200,000.00"/>
* e. Other	<input type="text" value="50,650.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="3,252,950.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12872 Process?**

a. This application was made available to the State under the Executive Order 12872 Process for review on

b. Program is subject to E.O. 12872 but has not been selected by the State for review.

c. Program is not covered by E.O. 12872

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

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 48, Section 9001)**

I AGREE

** The list of certifications and assurances, on an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix * First Name

Middle Name:


* Last Name:

Suffix:

* Title

* Telephone Number: Fax Number

* Email

* Signature of Authorized Representative:  * Date Signed

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/20/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0318-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

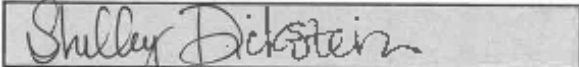
1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to ensure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Federal Governmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 (d)-f and 290 (e) 3) as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§801 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1601-508 and 5324-5328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §275c and 18 U.S.C. §874) and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction agreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1968 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523) and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1988 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1986, as amended (16 U.S.C. §470), EO 11583 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1986 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Dayton	08/15/2024

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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. 1701a) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

08/15/2024
Date

City Manager
Title

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 appropriate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2024 [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 VII 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

8/15/2024

Date

City Manager

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(e).

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.

Shelly D. Stein 8/15/2024
Signature of Authorized Official Date

City Manager
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

8/15/2024

Date

City Manager

Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.204.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.


Signature of Authorized Official

8/15/2024

Date

City Manager:

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.