

2024 ANNUAL ACTION PLAN DRAFT

THE CITY OF
YOUNGSTOWN
OHIO

DEPARTMENT OF COMMUNITY PLANNING AND ECONOMIC DEVELOPMENT MICROSOFT

City Hall, 4th Floor, 26 South Phelps Street, Youngstown, OH 44503

Executive Summary

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

1. Introduction

Annually, the City of Youngstown develops its Annual Action Plan to describe the planned investment of federal resources to implement specific activities related to the goals and priorities of the Consolidated Plan. The Consolidated Plan (Con Plan) is mandated by federal law and regulations promulgated by the U.S. Department of Housing and Urban Development (HUD) in order for the City to receive federal funding for affordable housing and community development initiatives benefitting primarily low- and moderate-income persons.

The purpose of the plan is to:

- To provide 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.
- To provide a suitable living environment through safer, more livable and accessible neighborhoods, greater integration of low- and moderate-income residents throughout the City, increased housing opportunities, and reinvestment in aging neighborhoods.
- To expand economic opportunities through job creation, homeownership opportunities, façade improvement, development activities that promote long-term community viability and the empowerment of low- and moderate-income persons to achieve self-sufficiency.

The City of Youngstown anticipates receiving the following grant amounts in fiscal year 2024:

- CDBG: \$3,425,697
- HOME: \$770,649
- ESG: \$306,074

2. Summarize the objectives and outcomes identified in the Plan

Housing needs among residents of the City of Youngstown were determined by analyzing housing problems by income level, tenure, and households with special needs during the creation of the 2020-2024 Consolidated Plan. Sources included the Comprehensive Housing Affordability Strategy (CHAS) dataset, which is based on the 2011-2015 American Community Survey Five-Year Estimates. This source analyzes households with one or more housing

problems (overcrowding, lacking adequate kitchen or plumbing facilities), and households experiencing cost burden and severe cost burden.

The most significant housing issue identified was cost burden, defined as spending between 30-50% of household income on housing costs such as mortgage and rent payments, and severe cost-burden, defined as households spending more than 50% of their income on housing costs. According to CHAS data, 34.1% of households in the City are cost burdened, particularly households with incomes between 0-50% AMI. A significant proportion of Youngstown households are severely cost-burdened as well, consisting 18.4% of households, particularly households with incomes between 0-30% AMI.

To address the identified housing needs, the City has established the following goals and outcomes to be achieved through the investment of its CDBG, HOME, and ESG resources in fiscal year 2024:

Goal Name	Goal Outcome Indicator
Increase supply of housing	Homeowner Housing Added: 3 housing units
Improve quality of existing housing	Homeowner Housing Rehabilitated: 303 housing units
Remove blight	Public Service activities other than Low/Moderate Income Housing Benefit: 93,099 persons
Public facility improvements	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 63,586 persons
Public infrastructure improvements	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 60,068 persons
Housing/services to the homeless and near-homeless	Homeless Person Overnight Shelter: 54 persons Homelessness Prevention: 155 persons
Reduce crime	Public Service activities other than Low/Moderate Income Housing Benefit: 24,380 persons
Assist public service providers	Public Service activities other than Low/Moderate Income Housing Benefit: 2,217 persons
Grant administration	Other: 1 Other
Repayment of Section 108 Loans	Other: 1 Other

3. Evaluation of past performance

The summary of past performance reported below was taken from the City’s most recently completed Consolidated Annual Plan Evaluation Report completed for fiscal year 2022:

Goal Name	Goal Outcome Indicator
Improve quality of existing housing	Homeowner Housing Rehabilitated: 206 housing units
Remove blight	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 47,335 persons
Public facility improvements	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 60,790 persons
Public infrastructure improvements	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 60,790 persons
Housing/services to the homeless and near-homeless	Homeless Person Overnight Shelter: 265 persons Homeless Prevention: 1,037 persons assisted
Reduce crime	Public Service activities other than Low/Moderate Income Housing Benefit: 63,660 persons
Assist public service providers	Public Service activities other than Low/Moderate Income Housing Benefit: 2,495 persons
Grant administration	Other: 1 Other
Repayment of Section 108 Loans	Other: 1 Other

4. Summary of Citizen Participation Process and consultation process

Public Needs Meeting – A public needs meeting was held on February 27, 2024, at 5:30 PM online via Zoom to educate residents and organizations about the HUD programs and obtain input on housing and community development needs.

Public Comment Period – A draft of the Annual Plan for FY 2024 was placed on public display for 30 days beginning April 1 through May 1, 2024.

Public Meeting – The City held a public meeting on May 22, 2024, at 5:30 PM at the Public Library of Youngstown and Mahoning County, 305 Wick Ave, Youngstown, Ohio 44503, to obtain final comments on the proposed Annual Action Plan for FY 2024.

5. Summary of public comments

The need for **more affordable housing options** was one of the most cited priorities at the stakeholder workshops and public meetings. The housing stock within the City is aging and generally considered to be low-quality or require heavy investment to bring up-to-code. High utility costs through plumbing and heating were also major issues associated with poor housing quality. Stakeholders suggested increased funding toward home repairs, rehabilitation, and code enforcement/ inspection as potential solutions to this issue. Additionally, while there is a large quantity of detached single-family housing units available throughout the City, there is a high demand for smaller 1–2-bedroom housing units that could be a more accessible housing option for residents.

In addition to developing more affordable housing, stakeholders stated there is a **need for housing stability**. This includes providing programs that educate renters and homeowners on proper housing maintenance and setting up mitigation funds which incentivize landlords to provide housing opportunities to Section 8 voucher holders.

Youth programs, beautification, and senior home maintenance assistance were also cited as priorities. Stakeholders believed that collaborations could be created to address multiple problems in one program, such as youth employment programs for neighborhood clean-up or to assist seniors with home rehabilitation and lawn care.

Homeless prevention services, specifically for special needs populations such as justice-involved individuals, victims of domestic violence, and unaccompanied youth, were also cited as major needs in the community. The most common cause of homelessness is due to the inability to access, afford, or maintain housing. These populations inherently face barriers in accessing

housing due to criminal history, lack of education or employable skills, and/or high cost-burdens due to crisis situations or lack of affordable childcare. Demand for rental assistance and utility assistance has seen astronomical increases, much of which can be attributed to COVID-related economic downturn.

As a result, **workforce and economic development** were also considered a high priority for the City. Workforce development programs would assist in bolstering the local workforce and developing businesses located within the Youngstown. Many small businesses lack the connections, capital, and skillsets required to sustain their ventures. While there are service providers, such as Youngstown Business Incubator and Flying High Inc., providing workforce development programs, the demand far outstrips their capacity to serve all interested individuals. Additionally, certain neighborhoods in Youngstown are in “food deserts” and located further away from certain quality-of-life services, such as housing cleaners and maintenance. For this reason, there is a need for programs and funds to support local businesses which provide affordable sources of food and home maintenance services.

Improved public facility and infrastructure needs, including improved streets, sidewalks parks, broadband access and public transit were cited as community needs. Public transit and broadband access are closely tied to access to employment opportunities. Additionally, these features have a disproportionately greater impact on low- and moderate-income households that may rely on this infrastructure for work or educational opportunities. Parks create a sense of community and maintaining them would facilitate investment in these areas.

Finally, **violence prevention and neighborhood safety** were also cited as a need. Stakeholders suggested adding security cameras in public areas and installing or repairing streetlights to address the need.

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

All comments and views were accepted. Comments outside the scope of the plan were not addressed.

7. Summary

In summary, the Annual Action Plan was developed with community input and reflects the needs of the City.

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	City of Youngstown	Community Planning and Economic Development
HOME Administrator	City of Youngstown	Community Planning and Economic Development
ESG Administrator	City of Youngstown	Community Planning and Economic Development

Table 1 – Responsible Agencies

Consolidated Plan Public Contact Information

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

1. Introduction

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

The City of Youngstown developed an outreach effort to maximize input from a large cross-section of stakeholders. The outreach effort included public meetings, stakeholder meetings, and published meeting notices.

Several housing, social service agencies, and other organizations serving the City of Youngstown were consulted during the development of this Consolidated Plan. The City held public needs meetings on February 27, 2024 and May 22, 2024. Participants included affordable housing providers, neighborhood organizations, homeless and social service providers, and city staff members.

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

The City of Youngstown collaborates with the Mahoning County Homeless Continuum of Care to address the needs of homeless persons and persons at risk of homelessness in the City. The mission of the Continuum is to end homelessness in the community. It will assist all persons and families who are homeless and/or near homeless in obtaining housing, economic stability and an enhanced quality of life through planning, education, advocacy and other comprehensive services.

Additionally, the City worked closely with the CoC to administer ESG-CV funds provided through the CARES Act. Programming includes Rapid Re-Housing that includes case management for those affected by COVID-19; homelessness prevention services through case management, rental assistance, utility payments, and security deposits; and emergency shelter operations. Additionally, a temporary shelter program utilizing Treasury funds was established through Catholic Charities for households impacted by COVID-related issues such as loss of income or housing.

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 CoC was consulted with to develop the homelessness strategy and ensure ESG funds are efficiently used and in compliance with the HEARTH Act and ESG program requirements. The CoC provided recommendations of the allocation of ESG funding and reviewed applications alongside the City. CoC also has established standards for completing quarterly reports and standards for Homeless Management Information System (HMIS) data quality reporting.

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

1	Agency/Group/Organization	City Youngstown, Community Planning & Economic Development
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development Anti-Poverty Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Public outreach and consultation, participation in stakeholder meetings.
2	Agency/Group/Organization	Youngstown Neighborhood Development Corporation
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
3	Agency/Group/Organization	Mahoning-Youngstown Community Action Partnership

	Agency/Group/Organization Type	Services - Housing Services - Elderly Persons Services - Employment
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
4	Agency/Group/Organization	Community Legal Aid
	Agency/Group/Organization Type	Services - Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
5	Agency/Group/Organization	Youngstown Tenant Council
	Agency/Group/Organization Type	Civic Leaders
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
6	Agency/Group/Organization	Home for Good
	Agency/Group/Organization Type	Services - Housing Services - Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
7	Agency/Group/Organization	Mahoning Valley YWCA
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
8	Agency/Group/Organization	Mahoning County Homeless Continuum of Care
	Agency/Group/Organization Type	Services - Homeless Continuum of Care
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings. Consulted with for homeless facilities, services, and strategy.
9	Agency/Group/Organization	Goodwill Youngstown
	Agency/Group/Organization Type	Services - Homeless
	What section of the Plan was addressed by Consultation?	Homelessness Strategy
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
10	Agency/Group/Organization	Compass Family and Community Services
	Agency/Group/Organization Type	Services - Homeless Services - Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Homeless Needs - Families with children Homelessness Needs - Unaccompanied Youth Homelessness Strategy

	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
11	Agency/Group/Organization	Inspiring Minds
	Agency/Group/Organization Type	Services - Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Economic Development
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
12	Agency/Group/Organization	Northeast Homeowners and Concerned Citizens Association
	Agency/Group/Organization Type	Civic Leaders Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Economic Development
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
13	Agency/Group/Organization	Youngstown Business Incubator
	Agency/Group/Organization Type	Business Leaders
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
14	Agency/Group/Organization	Youngstown Metropolitan Housing Authority
	Agency/Group/Organization Type	PHA

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Market Analysis
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings. Consulted with for public housing needs and strategy.
15	Agency/Group/Organization	CityScape
	Agency/Group/Organization Type	Planning organization
	What section of the Plan was addressed by Consultation?	Market Analysis Economic Development
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.
16	Agency/Group/Organization	Building Neighborhoods of Youngstown
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Economic Development
	How was the Agency/Group Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination	Attended stakeholder meetings.

Table 2 – Agencies, groups, organizations who participated

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

All relevant entities were considered for consultation.

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	Mahoning County Homeless CoC	The homelessness strategy was developed in consultation with MCHCOC to ensure the goals of the CoC were reflected in the Strategic Plan.
Comprehensive Economic Development Strategy	Eastgate Regional Council of Governments	The CEDS' economic development initiatives pertaining to Youngstown were taken into consideration with the Strategic Plan.
Mahoning Valley Opportunity Zones – Investment Prospectus	Eastgate Regional Council of Governments	The opportunity zones helped identify areas where investors are incentivized to spur economic development, job creation, and neighborhood revitalization.
Mahoning County 2018 Multi-Jurisdictional Hazard Mitigation Plan	Mahoning County Emergency Management Agency	The Mahoning County 2018 Multi-Jurisdictional Hazard Mitigation Plan was taken into consideration when considering risks associated with climate change and vulnerable populations disproportionately affected by natural hazard risks.

Table 3 – Other local / regional / federal planning efforts

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**

Public Needs Meeting – A public needs meeting was held on February 27th, 2024, at 5:30 PM online via Zoom to educate residents and organizations about the HUD programs and obtain input on housing and community development needs.

Public Comment Period – A draft of the Annual Plan for FY 2024 was placed on public display for 30 days beginning May 5 through June 5.

Public Meeting – The City held a public meeting on May 22, 2024, at 5:30 PM at the Public Library of Youngstown and Mahoning County, 305 Wick Ave, Youngstown, Ohio 44503, to obtain final comments on the proposed Annual Action Plan for FY 2024.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Needs Meeting	Non-targeted/ broad community	February 27, 2024 – 28 attendees	See comments in Citizen Participation Appendix	None	
2	Public Hearing	Non-targeted/ broad community	May 22, 2024	See comments in Citizen Participation Appendix	None	
3	Public Display Period	Non-targeted/ broad community	April 1 – May 1, 2024	None	None	

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

The following page details the anticipated available resources for the program year covering fiscal year 2024.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				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	\$3,425,697	0	0	\$3,425,697	\$0	Funds for housing and non-housing community development needs. This is the last year of the 2020-2024 ConPlan.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 3				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	\$770,649	0	0	\$770,649	\$0	Funds for rehabilitation of rental and homeowner housing units and rehabilitation. This is the last year of the 2020-2024 ConPlan.
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	\$306,074	0	0	\$306,074	\$0	Funds for homeless services including homeless prevention, rapid re-housing, emergency shelter, and mediation services. This is the last year of the 2020-2024 ConPlan.

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

Additional resources will be leveraged from local and regional foundations. The City of Youngstown is considered a fiscally distressed community; the City is not required to provide a match for its HOME funds.

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

The City is not using publicly owned land or property to meet the needs and goals of the Annual Action Plan.

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	Increase supply of housing	2020	2024	Affordable Housing	City-wide	Housing	HOME: \$470,649	Homeowner Housing Added: 3 housing units
2	Improve quality of existing housing	2020	2024	Affordable Housing	City-wide	Housing	CDBG: \$660,000 HOME: \$300,000	Homeowner Housing Rehabilitated: 303 housing units
3	Blight removal	2020	2024	Non-Housing Community Development	City-wide	Housing	CDBG: \$260,000	Public Service activities other than Low/Moderate Income Housing Benefit: 93,099 persons
4	Public facility improvements	2020	2024	Non-Housing Community Development	City-wide	Public Facility & Infrastructure Improvements	CDBG: \$838,297	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 63,586 persons
5	Public infrastructure improvements	2020	2024	Non-Housing Community Development	City-wide	Public Facility & Infrastructure Improvements	CDBG: \$750,000	Public Facility or Infrastructure other than Low/Moderate Income Housing Benefit: 60,068 persons

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Housing/services to the homeless and near-homeless	2020	2024	Homeless	City-wide	Homeless	ESG: 306,074	Homeless Person Overnight Shelter: 54 persons Homelessness Prevention: 155 persons
7	Reduce crime	2020	2024	Non-Housing Community Development	City-wide	Crime Reduction	CDBG: \$217,500	Public Service activities other than Low/Moderate Income Housing Benefit: 24,380 persons
8	Assist public service providers	2020	2024	Non-Homeless Special Needs	City-wide	Public Service	CDBG: \$249,900	Public Service activities other than Low/Moderate Income Housing Benefit: 2,217 persons
9	Grant administration	2020	2024	Admin	City-wide	Grant Administration	CDBG: \$350,000	Other: 1 Other
10	Repayment of Section 108 Loans	2020	2024	Non-Housing Community Development	City-wide	Repayment of Section 108 Loans	CDBG: \$100,000	Other: 1 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Increase supply of housing
	Goal Description	Fund activities that expand the supply and improve the condition of housing affordable to lower income households, including new construction and leveraging other public and private resources such as Low-Income Housing Tax Credits to make housing more available to low- and moderate-income households.
2	Goal Name	Improve quality of existing housing
	Goal Description	Extend the useful life of existing affordable housing through weatherization, repair, and rehabilitation programs.
3	Goal Name	Blight removal
	Goal Description	Demolition of vacant, blighted, and abandoned structures and removal of litter and trash in rights-of-way and illegal dumping sites.
4	Goal Name	Public facility improvements
	Goal Description	The City will use CDBG funds to make improvements to public facilities such as senior centers, homeless facilities, facilities for persons with special needs, youth centers, neighborhood facilities, parks, childcare centers, health facilities, and other public buildings over the next several years.
5	Goal Name	Public infrastructure improvements
	Goal Description	The City will use CDBG funds to make improvements to streets, sidewalks, stormwater infrastructure, water and sewer infrastructure, and other public infrastructure over the next several years.
6	Goal Name	Housing/services to the homeless and near-homeless
	Goal Description	The City will use CDBG and ESG funds to support shelter and housing operations. Acquisition, construction, or rehabilitation of temporary shelters and transitional housing for the homeless, including victims of domestic violence, veterans, disaster victims, families with children, unaccompanied youth, drug offenders, and formerly incarcerated persons. Provide funding to increase permanent supportive housing opportunities and work to create a stronger network of providers of supportive and mainstream services to homeless clients.

7	Goal Name	Reduce crime
	Goal Description	Provide community policing (7 officers and 1 supervisor) to target "hot spot" crime areas. Also work closely with business and residents in addressing quality of life issues.
8	Goal Name	Assist public service providers
	Goal Description	Services offered include but are not limited to elderly, youth transitioning out of foster care, victims of domestic violence, and justice-involved individuals facing re-entry. Services encompass childcare services, health and mental health services, broadband access, transportation, non-homeless special needs and employment training.
9	Goal Name	Grant administration
	Goal Description	Support administration and delivery of CDBG activities.
10	Goal Name	Repayment of Section 108 Loans
	Goal Description	Repayment of principal and interest on Section 108 loans for an amphitheater.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

The City of Youngstown estimates that FY 2024 HOME funds will be used to rehabilitate 2 housing units and construct 3 new housing units, all of which will be occupied by extremely low-income, low-income, or moderate-income families. FY 2024 funds will be used to rehabilitate 301 owner-occupied housing units, all of which will be occupied by extremely low-income, low-income, or moderate-income families

Projects

AP-35 Projects – 91.220(d)

Introduction

The following is a list of CDBG, HOME, and ESG activities that the City of Youngstown will undertake in FY 2024.

The funding amounts proposed below represent estimated amounts based on what the City expects to receive from HUD. The final project budgets will be determined upon Congressional budget appropriations and the City’s actual allocation amount.

For CDBG, should the City receive more or less than projected, the increase or decrease will be applied to the Public Facilities & Infrastructure Improvements project.

For HOME, should the City receive more or less than projected, the increase or decrease will be applied to the YNDC Single Family New Construction project.

For ESG, should the City receive more or less than projected, the increase or decrease will be evenly applied to all projects.

Projects

Sort Order	Project	Planned Activities
1	Administration	<ul style="list-style-type: none"> • CDBG Administration
2	Housing	<ul style="list-style-type: none"> • YNDC Emergency Repair • YNDC Roof Replacement • YNDC Strategic Acquisition & Rehab • YNDC Single Family New Construction • BNOY Color the City
3	Public Facilities & Infrastructure Improvements	<ul style="list-style-type: none"> • Coleman Professional Services Roof Renovation • Coleman Professional Services Boiler • Boys and Girls Club of Youngstown Renovation • Street Resurfacing • Fire Truck Lease Program • HUD Mandated Cooling and Warming Center • CityScape Sidewalk Squad • NE HOA - Beautification Litter Control and Youth • YNDC Revitalize Project • Green Youngstown Litter Control • Public facilities and improvements TBD

4	Public Services	<ul style="list-style-type: none"> • Flying High Inc - Prof Dev Center • Home for Good Reentry • YBI Youth Entrepreneurship Program • Inspiring Minds of Youngstown - Youth Enrichment • Students Motivated by the Arts • OCCHA - Family Social Services Specialist • Community Police Program • Lifetime Partnership Mentoring
5	Repayment of 108 Loan	<ul style="list-style-type: none"> • Section 108 Loan Payment (Amphitheater)
6	Housing and Homeless Assistance	<ul style="list-style-type: none"> • Compass Sojourners House • Help Network of NE OH - Homeless Prevention • Beautitude House - Merici Housing • Catholic Charities - Housing Stability • MYCAP - Homeless Prevention Assistance

Table 7 - Project Information

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

The majority of Youngstown’s projects, including public service, housing, public facility, and public infrastructure activities, are selected through a competitive process. All CDBG projects and programs funded in 2024 were chosen because they address high priority needs in the community. Projects selected for CDBG funding were prioritized on efficient utilization of non-CDBG funds and ability to serve the largest number of beneficiaries.

AP-38 Project Summary

Project Summary Information

1	Project Name	CDBG Administration
	Target Area	City of Youngstown
	Goals Supported	Grant Administration
	Needs Addressed	Grant Administration
	Funding	CDBG: \$350,000
	Description	General CDBG administration costs
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide
	Planned Activities	Administrative costs for grant management and monitoring.
2	Project Name	HOME and CDBG Housing
	Target Area	City of Youngstown
	Goals Supported	Improve quality of existing housing Increase supply of housing
	Needs Addressed	Housing
	Funding	CDBG: \$660,000 HOME: \$770,649
	Description	Owner-occupied housing unit rehabilitation
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	306 income-eligible households
	Location Description	City-wide
	Planned Activities	Owner-occupied housing unit rehabilitation, acquisition, home repairs and new construction of homes for LMI residents.
3	Project Name	Public Facilities and Infrastructure Improvements
	Target Area	City of Youngstown
	Goals Supported	Public facility improvements Public infrastructure improvements
	Needs Addressed	Public Facility & Infrastructure Improvements
	Funding	CDBG: \$1,848,297
	Description	Public facility and street improvements, beautification and streetscape activities, and fire department truck lease program.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	60,068 persons are expected to benefit from these improvements.
	Location Description	City-wide

	Planned Activities	Improvements include Coleman Professional Services Roof Renovation and Boiler repair, Boys and Girls Club of Youngstown restroom renovation, Street Resurfacing, Fire Truck Lease Program, CityScape sidewalk revitalization and beautification program, Northeast Homeowner Association litter control and Youth engagement program, YNDC Revitalize project, and Green Youngstown Litter Control. A HUD Mandated Cooling and Warming Center and Public facilities and improvement project will be determined later during the program year.
4	Project Name	Public Services
	Target Area	City of Youngstown
	Goals Supported	Reduce crime Blight removal Assist public service providers Assist in creating economic activities
	Needs Addressed	Crime reduction Public services Economic development
	Funding	CDBG: \$467,400
	Description	Public service programs that will serve a general low-moderate income population, including activities specific to youth and seniors.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	86,665 low- and moderate-income persons are expected to benefit from these services
	Location Description	City-wide
	Planned Activities	Services include Flying High Inc Professional Development programs, Home for Good Reentry housing programs, YBI Youth Entrepreneurship program, Inspiring Minds of Youngstown Youth Enrichment program, Students Motivated by the Arts public programming, OCCHA supportive services, Community Police Program, and Lifetime Partnership Mentoring
5	Project Name	Repayment of 108 Loan
	Target Area	City of Youngstown
	Goals Supported	Repayment of Section 108 Loans
	Needs Addressed	Repayment of Section 108 Loans
	Funding	CDBG: \$100,000
	Description	Repayment of Section 108 Loans for an amphitheater
	Target Date	6/30/2025

	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide
	Planned Activities	Repayment of 108 Loan for an amphitheater
6	Project Name	Housing and Homeless Assistance
	Target Area	City of Youngstown
	Goals Supported	Provide housing/services to the homeless and near-homeless population
	Needs Addressed	Homeless
	Funding	ESG: \$306,074
	Description	Assistance to shelters and provide services to homeless individuals and families.
	Target Date	6/30/2025
	Estimate the number and type of families that will benefit from the proposed activities	209 persons at risk of homelessness or experiencing homelessness
	Location Description	City-wide
	Planned Activities	Homeless services include homeless prevention, rapid re-housing, emergency shelter, and mediation services. Youth and victims of domestic violence shelters are included in these activities.

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

Assistance will be provided city-wide.

Geographic Distribution

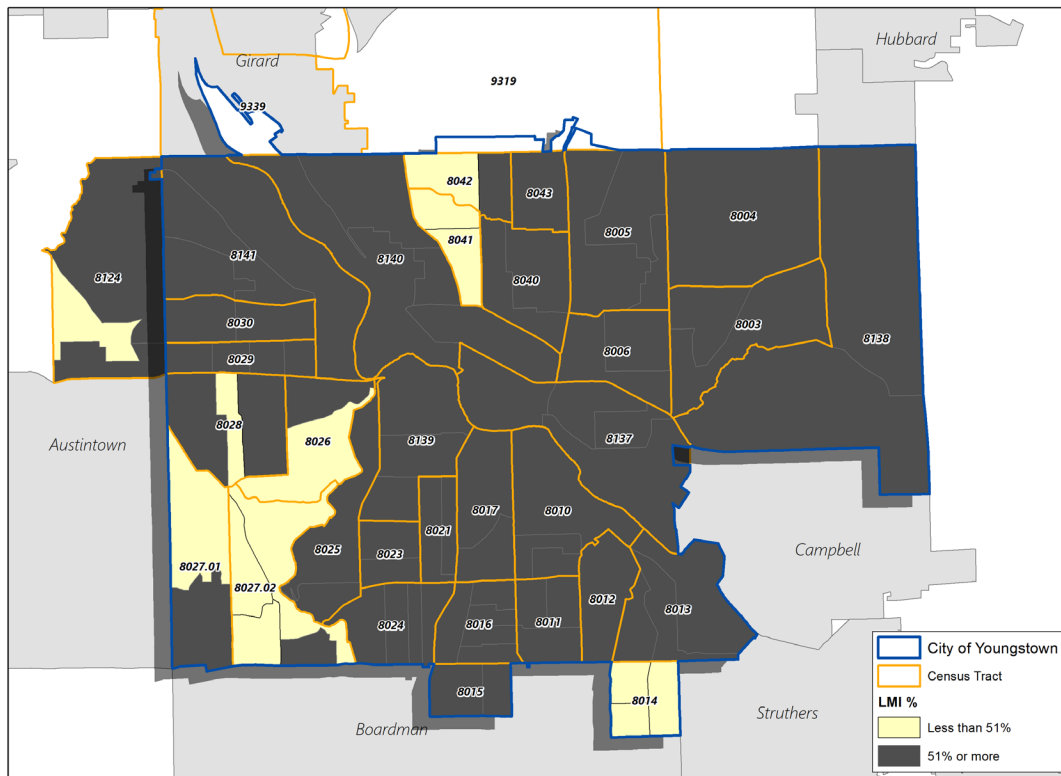
Target Area	Percentage of Funds
City of Youngstown	100

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

According to 2011-2015 CHAS data, 68.9% of the City of Youngstown’s households are considered low- to moderate-income. With the majority of block groups eligible for area benefit, the need for investment is city-wide.

Low- and Moderate-Income Block Groups, 2015 - Youngstown, OH



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	306
Special-Needs	0
Total	306

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	3
Rehab of Existing Units	301
Acquisition of Existing Units	2
Total	306

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

AP-60 Public Housing – 91.220(h)

Introduction

The Youngstown Metropolitan Housing Authority (YMHA) has created affordable housing opportunities for residents since the early 1930s. YMHA primarily operates in the City of Youngstown but also maintains scattered sites throughout Mahoning County. YMA currently manages a portfolio of 1,455 public housing units and 2,280 Housing Choice Vouchers.

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

YMHA continues to meet the housing needs of low-income households in Youngstown and Mahoning County through the following strategies:

- Maintain a minimal vacancy rate in the public housing program and increase utilization of the Housing Choice Voucher (HCV) program to maximize the number of available assisted housing units.
- Continue to provide housing dedicated to the needs of seniors by maintaining the designation of certain public housing properties through HUD's Designated Housing Plan for the Elderly.
- Renovate and modernize the public housing stock with the use of Capital Funds and seek additional financing opportunities for the same.
- Increase the supply of assisted housing units by developing new units and applying for additional vouchers.
- Collaborate and continue support of local initiatives that provide housing for homeless and special needs households through the public housing and HCV programs.
- Continue to provide economic opportunities for residents through the Family Self-Sufficiency (FSS) program and other resident services.

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

Each property managed by YMHA has a Residents' Council to provide input on the needs of residents and assist in decision-making. Additionally, YMHA's FSS program helps families to find and maintain employment and establish a savings account ultimately to independently maintain their own housing in the future.

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

YMHA is not designated as troubled.

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

Introduction

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

Help Network of Northeast Ohio serves to provide immediate comprehensive services to support and connect people with community resources. Services directly related to housing include:

- Dispute resolution services as an alternative to options like court and law enforcement. Disputes include civil actions, landlord/tenant, consumer, workplace, neighborhood, and family disputes.
- The Project for Assistance in Transition from Homelessness (PATH) to link individuals with resources and stable housing
- The Housing Opportunities Program, providing rental assistance for individuals receiving services through agencies connected with the Mahoning County Mental Health and Recovery Board.

Catholic Charities Regional Agency also conducts homeless outreach as part of their Rapid Re-Housing program. Individuals and families receiving services are housed, connected to other community resources, and receive case management as quickly as possible.

Addressing the emergency shelter and transitional housing needs of homeless persons

While ESG funding is primarily allocated to homelessness prevention, the City also understands that emergency shelters are also important in addressing homeless needs. Rescue Mission of the Mahoning Valley is the largest service provider of emergency shelter and is funded without ESG dollars. Shelters are available for families and single men and women. Services offered at their emergency shelters include free meals available to the public, workforce and career assistance, and counseling and case management. The Beautitude House Merici Housing is an emergency shelter that provides housing to individuals living with HIV/AIDS.

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

Sojourner House Domestic Violence Center provides, in addition to housing, individualized case management for legal, financial, medical, vocational, and housing needs; education and activities for both parents and children; monthly support groups; and public speaking and in-service training for both clients and service providers for adults in crisis.

In addition to the general homeless services offered by Catholic Charities, supportive services targeting seniors and pregnancy support services are available in Mahoning County. Senior supportive services include client assessment, casework, face-to-face interviews, collateral interviews, service delivery, advocacy with community resources, assistance with entitlement program applications, and networking with formal and informal support systems on behalf of clients. The First Step Program for persons experiencing pregnancies in a crisis situation provides supportive case management, limited emergency financial assistance, connections to community resources, baby resources, and information and advising on parenting and adoption options. While these services are not directly funded by CDBG dollars, funding for other services help offset costs that allow for these services to continue running.

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.

Homelessness prevention services offered through Catholic Charities include basic needs assistance with food utilities, prescriptions, toiletries, and more are provided in the case of emergency. Educational programs to teach clients how to maintain housing are provided through Catholic Charities Housing Opportunities Program, providing information and case management services through down payment assistance, financial education sessions, and individualized case management to determine available resources to find housing.

Additionally, Catholic Charities and Home for Good offer ex-offender/prison re-entry services. Catholic Charities' linkage service works with people leaving the criminal justice system with mental illness who are at-risk of homelessness, connecting them to resources for employment, housing, treatment, and other community resources. Similarly, Home for Good provides services and referrals for housing, employment, education, counseling, and other necessities to formerly incarcerated individuals. Home for Good will receive \$24,950 in CDBG funds to

facilitate the running of their program.

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

Introduction:

To identify barriers to affordable housing, the City of Youngstown completed an Analysis of Impediments to Fair Housing Choice in October 2023. The AI explores key issues and obstacles that influence affirmatively furthering fair housing as well as the effectiveness of the fair housing system.

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

In accordance with the AI, the following chart describes the identified impediments and the strategies planned to address them:

Goal	Impediment to be Addressed	Strategy	Timeframe
<p>Goal 1: Expand the affordable housing inventory in locations where it can be supported by adequate infrastructure.</p>	<p>A lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes.</p> <p>A review of the City’s zoning ordinance revealed restrictive language related to the definition of “family”, the definition and regulation of “group homes” for persons with disabilities, and a lack of “reasonable accommodation” provisions.</p>	<p>Strategy 1.1: Review the zoning ordinance and other land development regulations for ways to encourage housing rehabilitation and/or redevelopment of single-family homes to create more affordable housing options.</p>	<p>annually</p>

<p>Goal 2: Ensure the City’s obligation to affirmatively further fair housing remains in compliance.</p>	<p>A review of the City’s zoning ordinance revealed restrictive language related to the definition of “family”, the definition and regulation of “group homes” for persons with disabilities, and a lack of “reasonable accommodation” provisions.</p> <p>The need for continuing fair housing education, outreach, and enforcement remains high.</p>	<p>Strategy 2.1: Review the Zoning Risk Assessment for the City’s zoning ordinance to identify regulatory provisions that are inconsistent with fair housing laws and amend regulations as needed.</p>	1-2 years
		<p>Strategy 2.2: As part of the City’s local application process for HUD funds, provide a fair housing training component that all subrecipients are required to attend before signing their grant agreement.</p>	annually
		<p>Strategy 2.3: As part of the City’s local application process for HUD funds, include a list of various fair housing activities of which applicants must complete one activity annually as part of its subrecipient grant agreement.</p>	annually
<p>Goal 3: Develop an annual plan for providing regular fair housing education, outreach and enforcement.</p>	<p>The need for continuing fair housing education, outreach, and enforcement remains high.</p>	<p>Strategy 3.1: Contract with a HUD Qualified Fair Housing Enforcement Organization to provide educational training for architects and local code enforcement officials on design and construction standards for qualifying multi-family new developments to ensure accessibility requirements are met.</p>	annually
		<p>Strategy 3.2: Contract with a HUD Qualified Fair Housing Enforcement Organization to conduct paired testing in the rental market for discrimination based on disability (reasonable accommodation, accessibility requirements of qualifying multi-family developments).</p>	annually

		<p>Strategy 3.3: Partner with local realtor groups, local landlords, local lending institutions, and the Ohio Civil Rights Commission for an annual fair housing forum with guest speakers.</p>	annually
		<p>Strategy 3.4: Contract with a HUD Qualified Fair Housing Enforcement Organization to provide fair housing training for elected officials, appointed members to planning and zoning boards, county public housing authorities, local municipal planners, and City staff.</p>	annually
		<p>Strategy 3.5: Create and distribute a Fair Housing Guide for Youngstown that include resources for learning more about the topic, contact information for the City’s Fair Housing Officer and various entities who can assist with housing discrimination complaints, rights and responsibilities of tenants, rights and responsibilities of landlords, and other important information to assist City residents.</p>	annually
<p>Goal 4: Provide homebuyer counseling focusing on R/ECAP households, minorities and persons with Limited English Proficiency to expand homeownership opportunities.</p>	<p>Minorities are underrepresented among homeowners.</p> <p>The need for continuing fair housing education, outreach and enforcement remains high.</p> <p>A lack of affordable housing has a greater negative impact on lower income families with children, minorities, people with disabilities and potentially other members of the protected classes.</p>	<p>Strategy 4.1: Provide funding to a HUD-certified housing counselor to conduct homebuyer and homeownership classes with at least one class bi-annually provided in Spanish.</p>	annually

<p>Goal 5: Ensure that Persons with LEP have access to HUD programs and services.</p>	<p>The City lacks a Language Access Plan.</p>	<p>Strategy 5.1: Conduct the Four-Factor Analysis to determine how the City can provide meaningful access that balances four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the City’s HUD programs; (2) the frequency with which LEP individuals come into contact with the City’s Community Development Division; (3) the nature and importance of the program, activity or service provided by the CDD to its beneficiaries; and (4) the resources available to the CDD and the costs of interpretation/translation services.</p>	<p>Within the first year</p>

AP-85 Other Actions – 91.220(k)

Introduction:

Over the next year, the City of Youngstown plans the following actions to help address the housing and community development needs of City residents, especially low and moderate-income residents.

Actions planned to address obstacles to meeting underserved needs

The City is allocating a total of \$249,900 in CDBG funding to public service agencies that will meet the needs of the underserved in providing re-entry assistance to citizens returning from prison, workforce development, neighborhood clean-ups, and youth programs.

Actions planned to foster and maintain affordable housing

To allow low- and moderate-income families to maintain their homes, home repairs and rehabilitation programs offered by Youngstown Neighborhood Development Corporation (YNDC) are being funded through CDBG (\$640,000) and HOME (\$770,649) dollars. Emergency repair, such as furnace and plumbing repairs, and exterior home repairs are offered at no cost to eligible homeowners. YNDC also acquires and renovates vacant homes and offers them to new homeowners at an affordable price.

Actions planned to reduce lead-based paint hazards

Youngstown will cooperate with the Mahoning County Lead-Based Paint Hazard Control Program, which serves to make housing units lead safe use a combination of interim controls and lead abatement techniques to reduce environmental health issues in housing. The Lead Hazard Control Program partners with local hospitals to coordinate screening children and training/educating parents regarding lead and healthy homes issues.

Actions planned to reduce the number of poverty-level families

Public service activities intending to alleviate poverty revolve around youth development programs and workforce development. Planned activities include Youngstown Business Incubator, Flying High's Professional Development Center, Inspiring Minds of Youngstown, Students Motivated by the Arts, OCCHA – Family Social Services Specialist, and YPD's Lifetime Partnership Mentoring Program.

Actions planned to develop institutional structure

The City will continue to participate in developing institutional structure through the participation in the CoC, Eastgate Regional Council of Governments, work closely with the

Regional Chamber of Commerce, the Western Reserve Port Authority and the Mahoning Rivers Mayors Association and attend various neighborhood planning meetings.

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

The City will continue to work with YMHA, YNDC, and other housing professionals to ensure housing needs are addressed. Social service agencies will continue to provide needed assistance to families and the City will maintain communication and coordination to ensure their needs are met.

Program Specific Requirements

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

Introduction:

**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
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**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:

No other forms of investment outside of the Annual Action Plan are being used

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:

Please refer to the Appendix for the full HOME Recapture and Resale policy for the City of Youngstown. The recapture policy will be in effect for a time frame equal to the period of affordability as described by the HOME program regulations. The form of recapture to be used shall be “reduction during the affordability period (forgiveness).” In the event of the property changing title during the required affordability period, the City will recapture a pro-rata amount tied to the length of time remaining on the affordability period from the net-profit. If the net-proceeds are insufficient the City will retain any remaining net proceeds following payment of the first mortgage. The City shall have the right of first refusal to buy out the first mortgage from the primary lender in the event of foreclosure.

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

The City of Youngstown requires HOME program funded activities have a monitored affordability period by means of deed restrictions placed on the property. These restrictions will be in the form of a recapture policy.

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:

There are no plans to refinance existing debt secured by multifamily housing.

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

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

Please see attached Unique Appendix containing ESG Policies and Procedures.

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

The Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements established by HUD, each ESG-funded program or project within the Continuum of Care is required to use the assessment system. The City and all subrecipients are members of the Continuum of Care and will ensure the screening, assessment and referral of program participants are consistent with the written standards adopted. All victim service providers have chosen to use the Continuum of Care's coordinated assessment system.

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).

Members of the CoC that do not have a conflict of interest reviewed applications for funding and ranked them based on meeting the needs of the homeless population and recommended funding amounts to the City. The City accepted the recommendations of the CoC Committee.

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.

The CoC is able to meet the homeless participation requirement and consults with homeless individuals in considering policies and funding decisions.

5. Describe performance standards for evaluating ESG.

Performance Standards: The performance standards for evaluating ESG activities are as follows:

- A. All activities are funded based on specific expected accomplishments (goals) of the annual number of people to be served

- B. All accomplishments are reported in the HMIS, and sub grantees are required to report quarterly to the CDA specific accomplishments
- C. The actual accomplishments are measured against the goal to evaluate the effectiveness of the program