

**Cuyahoga County
Board of County Commissioners**

FY 2010 Application

APPROVED

**for Community Development Block Grant and Emergency
Shelter Grant funding
and the Cuyahoga Housing Consortium for HOME funding**

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

One-Year Action Plan

**for
Fiscal Year 2010
January 1, 2010 to December 31, 2010**

**Prepared by the Department of Development
on behalf of the Cuyahoga Urban County
for Community Development Block Grant and Emergency Shelter Grant funding
and the Cuyahoga Housing Consortium for HOME funding**

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ACTION PLAN

Annual Action Plan includes the [SF 424](#) and is due every year no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Executive Summary 91.220(b)

1. The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

GOALS OF THE Urban County

Providing decent housing:

This goal includes **1)** retaining an affordable housing stock; **2)** increasing the availability of permanent housing in standard condition and at an affordable cost to low income and very low income families, **3)** increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence, **4)** assisting homeless persons that have completed transitional programs to obtain appropriate housing, and **5)** assisting persons at-risk of becoming homeless.

Providing a suitable living environment:

This goal includes improving the safety and livability of neighborhoods; deteriorating or deteriorated neighborhoods; restoring and preserving properties of special historic, architectural, or aesthetic value; and conservation of energy resources.

The Cooperation Agreements currently in force with the 50 local communities participating in the Urban County provide that at least 40% of our annual CDBG allocation is made available to finance a Municipal Grant Program for eligible community development activities. This commitment is honored and managed through a competitive application process that is open and available to all participating communities in the Urban County.

Expanding economic opportunities:

This goal includes providing and retaining jobs that are accessible to low income persons living in areas affected by those programs and activities, increasing the availability of mortgage financing for low income persons at reasonable rates using nondiscriminatory lending practices, providing access to capital and credit for development activities that promote the long-term economic and social viability of the community, and creating self-sufficiency opportunities for low income persons to reduce generations living in poverty.

OUTCOME PERFORMANCE MEASUREMENT SYSTEM

HUD instituted new submission procedures in fiscal year 2007 applications by requiring recipients of federal funding to assess the outcomes of the program in question. In 2007, Cuyahoga County instituted a new Performance Measurement System to establish and track measurable objectives and outcomes for the CDBG, HOME, and ESG programs. All approved applicants are required to comply with this Performance Measurement System in 2010 as well.

I. OBJECTIVES

Each proposed activity must meet one of the following objectives first stated in the original language of the CDBG regulations.

Goal #1 – Create a suitable living environment

This objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment (such as poor quality infrastructure) to social issues such as crime prevention, literacy or elderly health services.

Goal #2 – Provide decent housing

This objective focuses on housing programs where the purpose of the program is to meet individual, family, or community needs and not programs where housing is an element of a larger effort, since such programs would be more appropriately reported under suitable living environment.

Goal #3 – Create economic opportunities

This objective applies to the types of activities related to economic development, commercial revitalization, or job creation.

II. OUTCOMES

Improve availability/accessibility

This category applies to activities that make services, infrastructure, public facilities, housing, or shelters available and accessible to low/moderate income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low/moderate income people where they live.

❑ **Improve affordability**

This category applies to activities that provide affordability in a variety of ways in the lives of low/moderate income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.

❑ **Improve sustainability**

This category applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low/moderate income or by removing or eliminating slums or blighted areas through multiple activities or services that sustain communities or neighborhoods.

Note: Each of the Objectives (Goals 1-3) is matched with one of the three Outcomes in a format required by HUD.

The American Dream Downpayment Assistance Initiative, ADDI, was directed to first time homebuyers, but was not authorized by Congress for funding in 2009 and is not included in the most recent appropriation legislation for 2010.

The following table was developed to give the reader insight into the Urban County's programming for 2010 as well as providing a format that would show the Outcomes, Objectives and Indicators the county will use.

Cuyahoga Urban County FY 2010 Consolidated Plan Proposed CDBG Activities				
Project	Objective	Outcome	Indicator	Amount
Community Development				
Competitive Municipal Grant	Suitable Living	Sustainability	10,000 People	\$1,835,000
Community Park Revitalization	Suitable Living	Sustainability	3 Facilities	\$ 137,000
Economic Development	Economic Opportunitie	Accessibility	16 Jobs	\$ 247,000
Demonstration Micro Lending	Economic Opportunitie	Accessibility	8 loans	\$ 200,000
CD-ED Program Staffing	Suitable Living	Sustainability	Businesses	\$ 400,000
Subtotal				\$2,819,000
Housing				
Single Family Rehabilitation	Decent Housing	Sustainability	12 Households	\$ 108,000
Energy Efficiency Improvements	Decent Housing	Affordability	364 Households	\$ 140,000
Senior Safety	Suitable Living	Accessibility	100 Households	\$ 220,000
Housing Program Staffing	Suitable Living	Sustainability	55 Households	\$ 465,000
Subtotal				\$ 933,000
Public Service				
Homeless Assistance	Suitable Living	Accessibility	55 People	\$ 20,000
Housing Services & Counseling	Suitable Living	Accessibility	100 Households	\$ 250,000
Subtotal				\$ 270,000
Targeted Assistance				
Litter Control	Suitable living	Sustainability	115,000 People	\$ 40,000
Subtotal				\$ 40,000
Administrative Cap				
General CD Administration	N/A	N/A	1 organization	\$ 679,000
Community Planning Assistance	N/A	N/A	3 organizations	\$ 70,000
Fair Housing Activities	N/A	N/A	1,000 People	\$ 130,000
Subtotal				\$ 879,000
Total 2010 CDBG Program				\$ 4,981,000
Projected Funding includes known funds available from carryforwards and thru entitlement grant & revolving loan income				

Urban County FY 2010 Consolidated Plan Proposed HOME & ESG Activities				
Also includes activity by HOME Consortium Partners				
Project	Objective	Outcome	Indicator	Amount
HOME Programming				
Single Family Rehabilitation	Decent Housing	Sustainability	100 Households	\$1,000,000
Multi Family Unit	Decent Housing	Accessibility	100 Households	\$ 116,000
Downpayment Assistance	Decent Housing	Affordability	100 Households	\$ 570,000
TBRA assistance	Decent Housing	Affordability	60 Households	\$ 400,000
Other Consortium Partners	Decent Housing	Affordability	70 Households	\$ 891,000
Subtotal				
CHDO Activity	Decent Housing	Accessibility	10 Households	\$ 450,000
Subtotal HOME Programming				
HOME Administration	N/A	N/A	5 organizations	\$ 330,000
Projected Funding includes new funds, carry-forward funds, and anticipated program income				
Total FY 2010 HOME Program				\$3,757,000
ESG Programming				
Homeless Activities	Suitable Living	Accessibility	300 People	\$ 166,000
Administrative Funding	N/A	N/A	1 organization	\$ 8,000
Projected Funding includes new funds and carry-forward funds,				
Total 2010 ESG Program				\$ 174,000

Performance Assessment

The accomplishments of the programs operated by the Urban County, the Housing Consortium, and our Continuum of Care partners in 2005 - 2008 are summarized on the following page. Accomplishments during program Year 2009 are still being compiled and will be available at the end of March 2010. In general, the Urban County and Housing Consortium has exceeded its goals during the 2004 to 2009 5-Year Plan.

Performance Outcomes – 2005 to 2009 Performance Table

Objectives	Outcomes	Indicators		
		Program	2005 to 2009	
		Name of Program	Proposed	Actual
Provide Decent Affordable Housing	Accessibility Expand or create decent affordable housing			
		CHDO	50 U	44 U
		Rental	200 U	728 U
	Affordability Reduce the cost burden of decent Affordable housing	Weather-ization	1,820 U	1,518 U
		Downpay Assist.	407 H	377 H
		TBRA	270 H	514 H
		Multi-Fam SPC/HAP	230 U	992 U
		TBRA SPC	360 H	1,884H
	Sustain-ability Preserve or maintain	1-Family Rehab	500 H	681 H
Create a Suitable Living Environment	Accessibility Expand or create suitable living environments	homeless	1,650 P	2,879 P
		Housing advice	2,500 H	3,724 H
	Sustain-ability Preserve or maintain suitable living environments	Muni Grant	100,000 P	92,386 P
		Exterior Maintenance	300 H	394 H
		Lead	275 H	264 H
		TAP	115,000 P	115,327 P
Create Economic Opportunities	Accessibility Expand or create Economic opportunities	ED Loans	40 Jobs	164 Jobs
	Sustain-ability Preserve or maintain	CDBG Store-front	25 Busi-nesses	3 Busi-nesses

Key

H = household U = units P = people

Citizen Participation 91.220(b)

2. Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan).

The City of Cleveland is a HUD entitlement jurisdiction and receives a CDBG allocation about eight times larger than the county's allocation. Residents from the City seeking services are referred to Cleveland's Department of Community Development. County CDBG funds, including HUD Section 108 funding may be used to assist an activity outside the Urban County if it is determined that such activity is necessary to further the purposes of the Act and the Urban County's community development objectives, and reasonable benefits from the activity accrue to residents within the Urban County (24 CFR 570.309). As such, the Department of Development may participate in projects in other entitlement jurisdictions, as appropriate, which includes the cities of Cleveland, Cleveland Heights, East Cleveland, Euclid, Lakewood, and Parma.

Urban County communities are required by the Citizen Participation Plan to hold a public meeting prior to submission of applications for the County's Competitive Municipal Grant Program. Public notice must be given of these meetings and staff of the Department of Development attends. Beginning in FY 1998, the Department has awarded extra points in its evaluation criteria during selection of Muni Grant projects for communities whose citizen participation efforts result in a high level of interaction in the planning process for the project. This has encouraged communities to include residents during the planning process. At least 20 such local meetings were held for the 2010 Municipal Grant application cycle. The results of these meetings and the discussions and topics raised are brought back to the Department for consideration in the development of programming ideas for the use of HUD funding or county general funds.

In addition and in conjunction with the development of our 5-Year Strategic Plan for 2010-2014 surveys were sent to every mayor and/or economic development director in the county (including the 9 jurisdictions that are not part of the Urban County) to gain a better understanding of the economic development needs that these public officials thought were pressing in their local communities. A similar survey was sent to all chief building officials in the 59 communities, again asking for their thoughts on housing issues. The return rate for both surveys surpassed expectations. Ideas expressed were considered in the development of the 5-Year Strategy and this annual Plan. The tabulations resulting from the surveys have been on the Department of Development's website for over three months. Increased collaboration was a common thread from the respondents and the Department will attempt to follow through on this issue. Several respondents to the survey cited one example of a successful prior collaboration. In 2007, members of the County's community development staff held three meetings in various parts of the county to discuss ways to better serve municipal needs in our area. As a result of the ideas and comments expressed, the 2008 Municipal Grant application process was split into two categories of projects – one pool for larger sums that would be available to communities once every four years and a second pool for smaller projects (\$100,000 CDBG maximum) that communities could apply for annually. Survey respondents also noted the extreme financial pressure being placed on their budgets. It is

more important than ever to work in creative ways in 2010 and beyond to improve the lives of our residents.

Communities wishing to participate in the Competitive Municipal Grant program are invited to a meeting in May/June where the application process is explained and new programs are highlighted. These meetings are well attended by representatives from the member communities. The application deadline is generally the first week in November. One-on-one consultations with municipal applicants are routinely granted prior to application deadlines to assist communities prepare the best application possible.

Prior to beginning to draft a 5-Year Strategy and Annual Plan for 2010, a public meeting was held on September 16, 2009 in the community of Brooklyn. Every Urban County member was invited as well as other interested parties as the meeting was also used to gather ideas about our U.S. Department of Environmental Protection funded Brownfield program. A Public Notice about the meeting was placed in The Plain Dealer on September 5, 2009 and was placed on the Department of Development's website on September 3, 2009. Representatives from the City of Cleveland, the Port of Cleveland, and Urban County communities of Warrensville Heights, Strongsville, Fairview Park, and University Heights attended the meeting. Praise was given for the revised and general funded storefront program, with its reduced paper work and simple requirements. Staff explained that information required to meet HUD guidelines drove the design of many of our HUD funded programs. Attendees also asked for an even smaller Municipal Grant competition so that the small communities could receive some funding.

In accordance with HUD regulations, a Draft Consolidated Plan document was released for a 30-day public comment period beginning December 10, 2009. A notice of availability was published in the local newspaper of general circulation, The Plain Dealer, on December 9, 2009. The document was made available at the following locations: the main libraries in the cities of Cleveland Heights, Euclid and Lakewood; the regional libraries of the Cuyahoga County Public Library system (Fairview Park, Maple Heights, Mayfield and Parma); the Public Administration Branch of the Cleveland Public Library located in Cleveland City Hall; and the office of the Cuyahoga County Department of Development. A copy also was provided to the City of Cleveland's Department of Community Development as well as the Cuyahoga Metropolitan Housing Authority's CEO. The Consolidated Plan drafts were posted on the first page of Development's county website with a linked comment button. 17 "hits" were recorded.

3. Provide a summary of citizen comments or views on the plan.

There were no comments received on the Draft 5-Year Plan or Annual Plan for 2010. At their January 11, 2010 meeting the Board of Commissioners approved the Plans.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

N / A See question 3 above

Resources 91.220(c)(1) and (c)(2)

5. Identify the federal, state, and local resources (including program income) the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include **Section 8** funds made available to the jurisdiction, **Low-Income Housing Tax Credits**, and competitive **McKinney-Vento Homeless Assistance Act** funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

The Competitive Municipal Grant Program provides funding for CDBG eligible activities. In FY 2010, the Urban County will commit over 1.8 million dollars to communities for projects ranging from new construction of industrial access roads, ADA improvements, public buildings, reconstruction of roads and sewers, to projects that support local housing improvements. There is a one-time increase of \$350,000 to assist communities struggling to find financing for needed community improvements and may be used to complement communities that have received NSP municipal funding.

No **Section 8** funds are made directly available to Cuyahoga County. Individual citizens and landlords deal directly with the Cuyahoga Metropolitan Housing Authority to receive such assistance.

Cuyahoga County has a Weatherization Program available to its low-income residents. Eligible residents apply for the Home Weatherization Assistance Program (HWAP) using the State of Ohio's Multi Energy Assistance Program application. This application allows Cuyahoga County residents to apply for several energy saving programs at once. The Department of Development manages this program for county residents who live outside the City of Cleveland. Prospective clients must make their request to and be approved by the state in order to receive HWAP assistance. Those applicants that meet the criteria are given eligibility points and are placed on a State Approved Client List in priority point order. This list is sent to the Department of Development for service within a six-month period.

While programs are being developed to assist home owners and renters in the housing crisis, the county will also continue funding its foreclosure prevention counseling at the \$250,000 level in Program year 2010. This will complement the work of the County Treasurer's Office. Urban County funding will only be available to Urban County residents.

Financial literacy efforts will continue in 2010. An application to the U.S. Treasury has been submitted, seeking \$400,000 to fund financial literacy education through schools and with potential homebuyers. This education will train participants how to take control of their financial futures and prevent financial victimization through asset preservation and increased savings. The Board of County Commissioners and the City of Cleveland created the Northeast Ohio Coalition for Financial Success in 2007 to serve as the primary catalyst and clearinghouse for these purposes.

Staff from the Department of Development coordinates their efforts with the Office of Homeless Assistance and providers of permanent supportive housing on increasing the number affordable housing units. Each year the Office of Homeless Services makes application on behalf of the City of Cleveland and the County for competitive **McKinney-Vento Homeless Assistance Act funds**. When this Action Plan was being written, the application had just been turned into HUD.

Low-income housing tax credit project are submitted on a project by project basis and are not determined in advance by the County.

While the County's Budget has not been formally adopted, the Board of Commissioners and senior administrative staff have tentatively budgeted, even in these tight economic times, resources to continue fostering job creation/retention activities. The exact amount will become known after this document is out for public comment.

6. Identify federal resources the jurisdiction expects to receive from the Housing and Economic Recovery Act and the American Recovery and Reinvestment Act that will be used to address priority needs and specific objectives identified in the plan. Identify whether Neighborhood Stabilization Program funding is being used to address priority needs.

The Department of Development will continue to use the remaining portions of the \$11.2 million in **Neighborhood Stabilization** funding (from the **Housing and Economic Recovery Act**) it received as a direct entitlement and the \$1.3 million received from the State of Ohio that are not already obligated and/or expended during 2010 and beyond. This includes signing contracts for \$2,803,112 in assistance to 3 rental property projects for persons who do not exceed 50% of the area median. This use will address an identified priority need.

Downpayment assistance will be afforded to at least 50 loans to households who are income qualified and are at 120% of area median income. Because this is an application driven process the exact demographics will not be known until actual loans are made. \$2,000,000 in NSP funding is budgeted to this program. This use will address an identified priority need.

Developer assisted projects will result in at least 20 homeowners who will be able to move into completely renovated properties to households who are income qualified and are at 120% of area median income. Again, the exact demographics will not be known until actual loans are made. \$2,000,000 is allocated to this project. This use will address an identified priority need.

Five grants are managed by the Department that are funded from the **American Recovery and Reinvestment Act**, and three ARRA bond issuances. They are:

- 1) CDBG-R funding of \$1,013,462 is directed to two projects. One project in Maple Heights that will eliminate the greatest source for the potential intermixing of storm water with sanitary sewer water during rain events. The project will receive \$500,000 in funding and coordinated with the Sanitary Engineers office. Another \$500,000 contract with the City of

Parma Heights will restore a road where the City of Cleveland Water Department is completing a badly needed water main replacement project. ARRA funding will enable the city to have a new road surface over the waterline project area. Without the stimulus funding, this would have been possible. Both projects meet an identified priority need.

- 2) \$1,552,324 in Homeless Prevention and Rapid Re-housing Program dollars are administered by the Office of Homeless Assistance to assist persons in danger of losing their housing by providing short term rental and/or other assistance and in identifying those who are in danger of becoming homeless or needing other types of counseling to assist them obtain suitable housing. These groups are among groups with the identified as being High priority needs.
- 3) \$9,554,460 in HWAP-ARRA funding was awarded to the Department of development by the state of Ohio, Office of Weatherization Assistance to assist persons who are 80% of median income with their needs to increase the energy efficiency in their housing units. This particular grant is available to all residents that qualify for HEAP in the balance of land in Cuyahoga County outside the City of Cleveland. The program typically targets those citizens whose income are 50% or less that median income and this group is our High priority service group.
- 4) \$1,900,000 in US EPA Revolving Loan Fund ARAR funding will be targeted to sites in need of clean-up of pollutants. This is a median priority of the Urban County.
- 5) \$5,783,000 in US Department of Energy Community Block Grant funding was approved for a service area that includes the majority of communities in the Urban County. The City of Strongsville received separate funding and the non-participating communities of Brecksville, Chagrin Falls, and Hunting Valley are eligible to receive assistance. This programming will contribute to making buildings owned by the county more energy efficient as well as having a component for municipalities to seek assistance in improving energy efficiency of their public structures. Because the grant was awarded on September 28, 2009, a complete program design has not been finalized. Energy efficiency is not listed in a HUD priority need but is clearly important issue for the new Obama administration as well as for Cuyahoga County.

Bond Issuance Authority from ARRA

- 6) The issuance of \$8.9 million in Qualified Energy Conservation Bonds is reserved to Cuyahoga County. The issuance is contemplated in 2010. Funds would be used to increase sustainable energy saving efforts. Precise program design has not been completed as this Annual Plan is being developed.

- 7) \$42 million of Recovery Zone Economic Development bonding authority will be directed to the Medical Mart project.
- 8) A \$64 million issuance in 2010 of Recovery Zone Facility Bonds will also be issued to assist in the convention center/medical mart project.

Identify whether CPD funding will be coordinated with Department of Energy's Energy Efficiency and Conservation Block Grants, and the Department of Labor's Workforce Investment Act programs to provide opportunities for unemployed, lower-skilled, and low-income women and men to advance along a middle class career track of increasing skills and wages.

The Department of Development has advocated with the local office of Workforce Investment Act for programs that train workers for the new energy technology jobs of tomorrow.

Also new employees at the Department of Development hired for temporary jobs resulting from ARRA funding have been filled by applicants referred by Workforce Development. When other opportunities present themselves additional opportunities for training become available, this resource will definitely be tapped again.

Moreover, the City of Cleveland, the Cuyahoga Metropolitan Housing Authority, the Urban County and the Workforce Investment Board have signed an agreement to coordinate Section 3 Business certifications made by each other and to provide forms where Section 3 businesses can meet with developers working on federally funded projects. Training opportunities for developing job ready skills training is coordinated with Workforce Development.

7. Explain how federal funds will leverage resources from private and non-federal public sources.

Conventional Economic Development loans made by the Department of Development always require private investor equity and may include a number of public and private sources that are non-federal. Two prominent sources are the state of Ohio's Clean Ohio Revitalization Fund, which has contributed over \$8,000,000 in funding to projects in Cuyahoga County. The second source, the Clean Ohio Assistance Fund, has contributed \$2,065,000 in the past three years to projects in Cuyahoga County. Of the six projects for which these funds were obtained, only two were also assisted with CPD program funds.

Cuyahoga Urban County HOME investments in supportive housing projects have also sought allocations of funds from the Ohio Housing Finance Authority Assistance and other non-federal housing sources.

In both cases the financing is obtained through cooperation of officials from the State of Ohio, the City of Cleveland, the Cuyahoga/Cleveland Port Authority, the Greater Cleveland Convention and Visitors Bureau, and the Greater Cleveland Partnership – all sitting at the table to determine if a proposed project is suitable for the area and once it is decided to attempt to attract the firm, how each partner determines what manner of contribution it can offer to make the financial package as attractive as possible.

Annual Objectives 91.220(c)(3)

** Complete and submit Table 3A.*

8. Provide a summary of specific objectives that will be addressed during the program year.

Please refer to Table 3A

The Urban County’s housing effort will be directed toward the 7,591 extremely low, low, and moderate income elderly renter households and the 4,674 extremely low, low, and moderate income small family renter households with housing problems as defined by HUD and outlined in the 2010 Five-Year Consolidated Plan (Table 2A). The Urban County also considers the 21,667 extremely low, low, and moderate-income homeowner households with housing problems to be high priorities. Other low and moderate-income household populations will not be excluded from our housing strategies.

The housing programs operated by the Department are designed to:

- Rehabilitate existing structures for renters and homeowners
- Encouraging home ownership with down payment assistance programs
- Provide funds to communities to preserve existing and vacant housing stock by funding needed repairs or demolition of municipal declared nuisances
- Provide supportive services and housing for the homeless and persons with disabilities
- Support the Cuyahoga County Land Reutilization Corporation (Land Bank)

Description of Activities 91.220(d) and (e)

** Complete and submit Table 3C*

Please refer to Table 3A for Descriptions of Activities.

9. Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.

The activities planned by the Urban County for renter and homeowner households include rehabilitation of units, tenant-based rental assistance, HWAP and support services for landlord/tenant conflicts.

Housing rehabilitation is important in order to provide housing that meets health and safety codes, including addressing the issue of lead-based paint. It should be noted that older housing stock could be expensive to rehabilitate, especially if lead paint hazards are identified.

In addition to single-family rental structures, the Urban County will utilize NSP funding to assist in the rehabilitation of larger apartment complexes and or new construction projects that create affordable living units for special needs population groups.

Finally, the Department will continue to work on the issues of foreclosure, prevention thru education and assistance to those impacted using primarily non-federal resources. A Financial Literacy Coalition was formed by Department of Development to take advantage of the new state law adding financial literacy to the high school curriculum. Non-federal dollars support this program,

10. Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) and general outcome category (availability/accessibility, affordability, sustainability).

Please Refer to Table 3A for outcome measures.

Geographic Distribution/Allocation Priorities 91.220(d) and (f)

11. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

Specific targeting of programming to limited geographic areas has not been a feature of Cuyahoga County's programming under the premise that local governments can best determine their local needs for CDBG assistance. This prioritization is achieved through applications for the Competitive Municipal Grant Program. Each CDBG Program cycle, the Department allocates 40% of its annual CDBG entitlement to this Municipal Grant Program. Furthermore, requiring citizen comment on the proposed application before the application can be submitted to the Department of Development is an attempt to involve local residents in the decision making process.

The 2008 Amended Plan for use of NSP funding however describes the areas where NSP funds will be available as required by the NSP regulations. That information is on Development's website:

<http://development.cuyahogacounty.us/en-US/Neighborhood-Stabilization-Program.aspx>

The majority of the Department's programming is intentionally designed to be application based. Applicants select themselves because they need assistance and, if they meet the income criteria, housing programming is made available to them. Programs that are applicant based are the best means of maintaining the quality of the existing housing stock as well as maintaining neighborhood stability.

Increasing concentrations of poor in the urban centers have been documented for years by the Council for Economic Opportunities, the Mandel School at Case Western Reserve University, and at the College of Urban Affairs at Cleveland State University. These trends are predicted to continue as part of the population dispersion that is occurring in the metropolitan Cleveland area. In the 2000 Census the Urban County population included 16.5% minority residents. This represents a 41% increase from the 1990 census, which listed a minority population of 11.7%. The largest concentrations of minority populations are in the 17 inner ring suburbs that are contiguous to the City of Cleveland. The majority of applications and rehabilitation occurs in these areas as they contain the households with the greatest needs.

There are few very large tracts of land in Cuyahoga County where new development can occur. To progress, development must occur at locations that have had prior uses that could have left behind contamination. The term that describes this effort is Brownfield Remediation. Cuyahoga County's Department of Development has developed significant capacity to assist in obtaining financing from sources such as the various programs at the State of Ohio and with the U.S. Environmental Protection Agency, EPA. The county has also issued special bonds to finance remediation efforts. These sources of funding will be aggressively sought in 2010 and are applied to all communities in the county. While major applications of existing CDBG and HOME revenue streams are not suited to these problems, but creating staff capacity to undertake remediation efforts complements the activities that are suited to the use of CDBG and HOME funding.

Major application of existing CDBG and HOME revenue streams are not suited to these problems, but creating capacity to undertake such problems complements the efforts that are suited to the use of CDBG and HOME funding. The county is seeking funding from other local, state and federal resources for Brownfield Remediation.

The writing of the 2010 Action Plan was delayed to attempt to find clarity in the direction and programming that the federal, state and local governments would authorize. That can no longer wait and this plan is being developed with the most current information available. It is anticipated that federal funding will remain at a similar level with 2009 funding. However, it is becoming clear that state and local government funding may be forced to reducing services and funding. The county budget projections do not appear to be as stressed as many others units of local government.

Areas of blight are identified every ten years in a process in cooperation with our municipal partners and this effort is believed to be one of the largest in the county with over 250,000 structures rated. The process has been consistent for over thirty years and with original HUD review of our procedures. These areas, known as Improvement Target Areas, ITAs, are used to identify activities fundable under HUD's slum and blight criteria.

12. Describe the reasons for the allocation priorities, the rationale for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) during the next year, and identify any obstacles to addressing underserved needs.

The Cooperation Agreements currently in force with the 50 local communities participating in the Urban County in program year 2010 provide that at least 40% of our annual CDBG allocation is made available to finance a Municipal Grant Program for eligible community development activities. This commitment is honored and managed through a competitive application process that is open and available to all Urban County participating communities. The Department believes that self-determination and prioritization of projects at the municipal level leads to the best quality application process. Thus, the exact nature and location of the projects to be funded is not known when this Consolidated Plan is submitted to HUD.

All other programs operated by the Department of Development require an application from an individual for a homeowner rehabilitation loan or a family for down payment assistance or for a business to apply for a commercial revitalization/rehabilitation loan/grant or for a business to request assistance to expand its operations. Individual self-selection/determination through an application process is intentionally followed by this county as the best program delivery model.

Annual Affordable Housing Goals 91.220(g)

** Complete and submit Table 3B Annual Housing Completion Goals.*

13. Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

Please refer to Table 3B

Public Housing 91.220(h)

14. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

The Urban County has two public housing facilities under the responsibility of the Cuyahoga Metropolitan Housing Authority (CMHA) within its boundaries: Oakwood Villas and Oakwood Garden located in the Village of Oakwood. Oakwood Villas has 91 one-bedroom units and one two-bedroom unit for elderly persons. Oakwood Garden consists of 25 three-bedroom single-family homes. The buildings in this facility are approximately fifteen years old, meaning that they are among the newer units in CMHA's inventory.

Oakwood Villas and Oakwood Garden are located on Broadway Avenue, an important arterial road in the southeast portion of Cuyahoga County. Broadway Avenue has regular RTA bus service, which provides access for residents to the retail and public facilities (post office, library, village hall, etc.) located along its length in Oakwood and the adjacent communities of Bedford and Maple Heights. The Urban County wishes to see the desirability of the facilities maintained.

15. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Not Applicable in Cuyahoga County

Homeless and Special Needs 91.220(i)

16. Describe, briefly, the jurisdiction's plan for the investment and use of available resources and describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness.

See the Continuum of Care Application appended to this application

17. Describe specific action steps to address the needs of persons that are not homeless identified in accordance with 91.215(e).

See the Continuum of Care Application appended to this application

18. Homelessness Prevention—Describe planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.

CDBG funding has been and will continue to be awarded to agencies providing landlord/tenant counseling services and/or mediation services to prevent homelessness in eviction cases. Primary beneficiaries are families with children. CDBG funding of \$250,000 in 2010 is allocated to address Foreclosure Prevention Counseling. This counseling is also supplemented by the Treasurer's Foreclosure Prevention Office with local government revenue.

In addition, \$640,283 in ARRA Homeless Prevention and Rapid Re-Housing, HPRP, funding has been awarded to agencies to address the issue of individuals and families with children at imminent risk of becoming homeless.

Barriers to Affordable Housing 91.220(j)

19. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Cuyahoga County will seek to support affordable rental housing projects that utilize the federal Low Income Housing Tax Credit Program. The County will continue to issue housing revenue bonds to support affordable housing development. Issuance of housing revenue bonds in combination with federal Low Income Housing Tax Credits, keeps a project's cost in a range, which allows rents to be set at affordable levels.

The providers of housing for persons with special needs (such as persons who are physically challenged and persons with developmental disabilities) are a network of experienced organizations fulfilling a demonstrated need in the metropolitan area. The Cuyahoga County Entitlements Group is developing an education program for local governments and developers to understand the rights of individuals under state and federal law.

Other Actions 91.220(k)

20. Describe the actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce the number of housing units containing lead-based paint hazards, reduce the number of poverty-level families develop institutional structure, enhance coordination between public and private agencies (see 91.215(a), (b), (i), (j), (k), and (l)).

Over the past three years, the issue of vacant and abandoned properties has changed from primarily a central city or urban core problem, to one that affects all communities in the county and throughout the United States.

- Led by the County Commissioners, all concerned County elected officials have taken steps to speed up the judicial foreclosure process. Among these steps are a temporary foreclosure filing fee surcharge, adopted by the Judges of the Common Pleas Court, which will bring an estimated \$2 million per year of new revenue for staff and associated costs dedicated to streamlining judicial foreclosure cases.
- The County has created a Foreclosure Prevention Office dedicated to serving homeowners through education, outreach, counseling, and other services to help them avoid unwise borrowing and to work out their mortgage payment difficulties by means other than foreclosures.
- Recently, Cuyahoga County has initiated Freddie Mac's Don't Borrow Trouble® campaign as a countywide effort.
- Cuyahoga County participates in the Vacant Properties Coordinating Council with elected officials representing the City of Cleveland and suburban leadership, to identify and promote best practices to reduce vacant and abandoned properties.
- Cuyahoga County is proposing that the \$1.3 million of State of Ohio NSP funding be used to demolish approximately 150 homes/housing units in Urban County communities. These structures must have been identified by local communities using their adopted standards for identifying blighted residential structures.
- New state land banking law to be used with Ohio NSP grant funds provided to Urban County.
- Cuyahoga Court of Common Pleas has adopted a mediation program to help minimize foreclosures.

Under recent legislation adopted by the Ohio Legislature, non-federal funds collected from delinquent property tax fees, DTAC fees, are allocated equally for use by the County Prosecutor and County Treasurer. In 2010 the proposed use of these revenues has not been officially adopted. Historically they have been used to continue the rescue fund for persons who have fallen behind in mortgage payments and need a one-time injection of cash to keep their homes as new repayment terms are negotiated. This is one of the very few locally financed and operated rescue fund programs in the United States.

In 2009, Cuyahoga County continued to be recognized nationally for its innovative actions to combat the foreclosure crisis facing the county as well as for creating programming models that other communities could use. Models developed by the county were placed on the National Association of County Community Economic Development Directors, NACCED, web site and Housing Manager Paul Herdeg participated in a NACCED national webinar on ways to use NSP funds in developing local programming. Governmental Programs Administrator Harry Conard was invited to participate in a panel discussion at the 2009 Annual Meeting of NACCED on the county's implementation of the Neighborhood Stabilization Program. The county is working with the 4th district of the Federal Reserve Bank to better understand the causes and affects of foreclosure and its affects on communities. The Department invited representatives of the Federal Reserve Bank to visit two communities impacted by vacant properties and has provided information to demonstrate the difficulty in obtaining properties through the existing foreclosure process.

Members of the Department were invited by the President Obama's Urban Affairs Office to discuss how the problem of abandoned properties and the crisis it has caused for America can be addressed. This was the first field meeting by officials from the Executive Office of President on this issue.

21. Describe the actions to coordinate its housing strategy with its transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

The Board of County Commissioners continues to support efforts that address the transportation barriers that prevent the region's labor force from accessing jobs. Development strategies that shape growth and redevelopment strategies that seek to reverse the economic decline of older communities require the encouragement of integrated transportation and land use planning efforts. Building better transportation linkages between the County's first-ring suburbs, other suburbs, and outlying employment and residential centers are examples that support the potential for job creation and economic growth for the county's low/moderate income populations. Investments have been made in apartment complexes built near stations of the county's rapid transit system.

However, given the poor revenue stream that provides significant funding for the area's regional transit system, cuts in service are being planned – effective in the spring of 2010. Sixteen bus routes are scheduled for elimination and major modifications to another 15 lines for weekend service. Other service cuts are also planned to a service that claimed the title of best transportation system in North America in 2008! Therefore further coordination, while desirable, may have to await an improved economy.

PROGRAM SPECIFIC REQUIREMENTS

CDBG 91.220(I)(1)

1. Identify program income expected to be received during the program year, including:
 - Amount expected to be generated by and deposited to revolving loan funds;
 - Total amount expected to be received from each new float-funded activity included in this plan; and
 - Amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

The County anticipates that it will receive and deposit \$500,000 in revolving loan repayments in 2010.

The county is not anticipating using the float funding process in 2010 unless an appropriate project presents itself.

Currently there are no existing float funded activities.

2. Program income received in the preceding program year that has not been included in a statement or plan.

There is no program income that has not been included in a statement or plan.

3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan.

There is one proposed project that anticipates using a 2007 award of \$2,000,000 in BEDI funding with an accompanying \$1 million in 108 financing for the Flats East Bank project that will assist in constructing a 20-story office building. Accompanying these funds are 1.5 million in EPA Brownfield remediation funding to complete clean-up of the site. The project is being developed with the City of Cleveland that is applying for a \$30 million 108 loan to assist in financing the project.

There remains about \$4.6 million in approved 108 debt capacity from an application made and approved by HUD in 1995. The Board of Commissioners as well as HUD must approve loans made from this pool of funding.

4. Surplus funds from any urban renewal settlement for community development and housing activities.

N / A

5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.

N / A

6. Income from float-funded activities.

N / A

7. Urgent need activities, only if the jurisdiction certifies.

There are no proposed urgent needs projects at this time.

8. Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate income.

Traditionally, the Urban County applies about 85% or higher of its CDBG funding to projects that benefit low/moderate income persons or families. This equates to an amount in excess of \$3,800,000 in related project funding.

HOME 91.220(I)(1)

1. Describe other forms of investment. (See Section 92.205)
If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254.

Affordability Restrictions for Owner-Occupied Property Acquired with HOME Assistance: All housing acquired for owner occupancy with HOME assistance will be subject to affordability restrictions for the period of affordability required by HOME program regulations. When the owner receives a HOME-funded down payment assistance loan to acquire the property, affordability will be ensured by a recapture provision in the loan note, requiring repayment of the HOME down payment assistance upon default, sale of the property, or the owner moving from the property before the end of the affordability period. The note may provide for reduction of the amount repayable on a percentage basis, after each full year of occupancy, over a period no shorter than the affordability period. In case of foreclosure sale during the affordability period, the amount of HOME funds to be recaptured shall be the lesser of the funds due under the note or the amount actually available after foreclosure sale, if any.

Any homeowner **who does not receive a HOME funded down payment assistance loan** and is acquiring a HOME assisted property shall execute and file with the County Recorder, at the time they take title, a legally valid and enforceable Declaration of Restrictive Covenants limiting resale of the property during the affordability period, to a buyer whose family qualifies as a low-income family and will use the property as its principal residence, at a price no more than which provides the original HOME-assisted owner a fair return on investment (including the homeowner's investment and any capital improvement) and ensure that the housing will remain affordable to a reasonable range of low-income homebuyers.

Income Determination for HOME Assisted Households: Each separate HOME funded housing assistance program operated by Cuyahoga County, its subrecipient agencies, and communities receiving allocations of HOME funds as member jurisdictions of the Cuyahoga Housing Consortium, shall use one of the three permissible methods of income determination as set forth in the HOME program regulations:

- 1) Part 5 (formerly Section 8),
- 2) Census Long Form as defined for the 2000 Census, or
- 3) Adjusted Gross Income as defined by the Internal Revenue Service for its Form 1040.

The same method of income determination shall be used for all participants and applicants for any one HOME assisted program. Written procedures for each program shall clearly state which income method will be used.

2. If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, state its refinancing guidelines required under 24 CFR 92.206(b).

No plans to refinance existing debt with HOME funds in 2010-2014.

3. Resale Provisions -- For homeownership activities, describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).

Same as above for #1.

4. HOME Tenant-Based Rental Assistance -- Describe the local market conditions that led to the use of HOME funds for tenant based rental assistance program.

If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

Cuyahoga County has determined that tenant-based rental assistance is an essential element of its consolidated plan. The local market conditions that lead to the choice of this program as one of Cuyahoga County's HOME funded activities are the shortage of affordable rental housing relative to the number of households making the transition from dependence on public assistance to self-sufficiency.

5. If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), describe these forms of investment.

Other forms of assistance are considered on a case-by-case basis after an application from a developer has been received and our staff has completed a proforma analysis of the project to ensure that the additional subsidy is warranted and falls within existing federal guidelines on unduly enriching developers

6. Describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units.

The Cuyahoga Housing Consortium has adopted a policy that requires developers of HOME assisted housing with five or more HOME assisted units to promote the availability of the housing through media suitable to reach all market segments especially those who might otherwise not be aware of the housing opportunity.

7. Describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

Cuyahoga County operates an active Small Business Enterprise program with a goal of up to 30% Small Business Enterprise participation in all goods and services contracts. Additionally, Cuyahoga County takes affirmative steps to maximize participation by Section 3 qualified contractors in all HUD funded housing development activities.

If the PJ will receive American Dream Downpayment Initiative (ADDI) funds, describe:
planned use of the ADDI funds.

There are no remaining ADDI funds from prior year allocations. Congress did not appropriate ADDI funding in 2009 and there are indications that Congress will no re-instate the program in 2010.

HOPWA 91.220(I)(3)

1. One year goals for the number of households to be provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family, tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

The Urban County does not receive HOPWA funding. The only CDBG entitlement community in Cuyahoga County to receive HOPWA funds is the City of Cleveland. Cleveland officials coordinate their efforts under their HOPWA grant with the Office of Homeless Services.

OTHER NARRATIVES AND ATTACHMENTS

PROVISIONAL BUDGETS

The programming described in the projects listed in the previously described Summary of Specific Annual Objectives Appendix is based on anticipated revolving loan fund program income estimates and entitlement grants. The allocations for the CDBG grant of approximately \$4 million, a HOME grant of approximately \$3 million, and an ESG grant of approximately \$165,000 were based on estimates at the time of submission. No HUD appropriation was finalized when this document went out for public comment. Every Entitlement community in the HOME Consortium anticipates receiving amounts similar to their 2009 allocations of CDBG funding.

The Department has budgeted for expenditures to cover administration, staffing and program activities that may be incurred before the receipt and execution of the FY 2010 CDBG, HOME and ESG grant agreements. These expenditures are included in the 2010 Action Plan, and it is anticipated that it may be necessary to incur some portion of these costs before the grant agreements are executed, this is permitted under section 24 CRF 570.200(h) "Reimbursement for pre-award costs" in the regulations. To provide the required public disclosure of the County's intent to use unobligated carry forward funds as necessary for such pre-award costs, the regulatory provisions for incurring pre-award costs under 24 CFR 570.200(h)(1) were discussed at the December 22nd public hearing on the Consolidated Plan. This includes but is not limited to the use of unobligated carry forward funds to establish/operate our loan programs including housing, economic development, municipal grant, and commercial revitalization programs.

If HUD funding is **not provided at the anticipated levels**, the Department will use available funding levels and existing resources including decertification of lapsed contracts to attempt to meet the anticipated program-funding levels in the 2010 Consolidated Plan. If necessary, program funding will be reduced proportionally with operating allocations receiving the smallest reductions.

If CDBG funds are **increased above the estimated grant level** of \$4 million. By contractual agreement with our Municipalities, 40% of the increase would be used to increase funding for the Competitive Municipal Grant Program. The remaining balance would be distributed to our housing programming, economic development, and/or other strategic initiatives. The known ESG appropriation will be distributed to provide additional services using the RFP process already in place. The HOME funds and ADDI funds, if any is appropriated, will be distributed to members of the HOME consortium according to the existing distribution formula as agreed by the Consortium members.

OBTAINING OTHER RESOURCES

Simultaneous with the development of this Consolidated Plan, Local county general funded programs have been agreed upon through Cuyahoga County's budgeting process. Funding for economic development for use in any jurisdiction in the county, assistance to support strategic investments recommended by the Cuyahoga Next Advisors, and work on vacant and abandoned/ foreclosed properties. Issuance of over \$8 million dollars in bond proceeds for renewable energy projects is anticipated, but programming for the proposed use of funding has not been finalized.

EPA funding from ARRA has been received in the amount of \$1.9 million. Funding will be used for environmental clean up assessments and remediation of sites. If additional EPA or state of Ohio funding is needed for specific sites project specific applications will be made to the appropriate agency.

These funds do not come with funding to provide for program oversight. The Department of Development uses approved staffing levels from the county general fund and, if the activity is CDBG eligible, funds are also reserved in the program, housing, and administrative operating items noted in this 2010 Annual Plan. The application of such expenses is monitored for compliance with O.M.B. Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments."

The Department of Development desired, as stated in its 2008 Consolidated Plan Draft for citizen comment (There was no comment.) and it's formal submission to HUD, to devote all of the existing, non-committed Storefront Revitalization funds and future revenues from this revolving fund to another purpose. The Storefront funds currently available in 2008 and from future receipts would be used in a demonstration Urban Parks Initiative that would be designed with comment from our Urban County partners. In 2009 four projects received funding totaling

Local governments have had reductions in their revenues for years and the trend increased greatly in 2009. Development staff learned that the first municipal service area to be cut was capital outlays for parks and recreation facilities. Several communities with a majority of low/moderate income residents have closed their parks entirely.

To improve the quality of life in our low moderate-income areas, the Department will continue in 2010 a program that will provide funding to public park facilities. Eligible parks must serve low/moderate income neighborhoods and funding will be offered for facilities and their repair but not for operations.

Continuation of Storefront Rebate Program

In 2010, county general funds will be available to continue a revised and highly successful storefront program offering rebates up to a maximum of \$8,000 for qualified exterior improvements in ITA areas and up to \$6,000 in non-ITA areas. An additional 5% rebate will be given to businesses that use green/sustainable/recycled materials.

FAIR HOUSING

Quoted from 5-Year Plan

The Urban County and the other members of the HOME Housing Consortium have undertaken numerous fair housing programs and activities to address equal treatment for all citizens. The Urban County has and will continue to promote fair and accessible housing with financial support, programmatic initiatives, and regional intergovernmental coordination.

Analysis of Impediments – Local and Regional Updates

Cuyahoga County led an intergovernmental planning process to conduct a Countywide Analysis of Impediments to Fair Housing Choice in 1996, with a local update in 2003. Considering the rapidly changing housing market, Cuyahoga County commissioned a new full Analysis of Impediments carried out in 2008 by Mullin & Lonergan Associates.

Discrimination against members of all protected classes was considered in the analysis, and substantial attention was paid to the ongoing problem of racial disparities in housing, including ongoing de facto segregation and concentration of poverty in minority areas.

Overall, four major impediments that affect housing choice in Cuyahoga County were identified:

1. A substantial segment of the affordable housing inventory has been lost due to demolition, deterioration, foreclosures, etc. and has had the effect of severely limiting where lower income households can choose to live.
2. Households may not consider housing opportunities across a broad range of neighborhoods and municipalities that provide a desired quality of life and affordable housing.
3. Minority mortgage applicants are much more likely to be denied home purchase loans and receive high-cost loans than white applicants.
4. Many municipal zoning ordinances are in violation of fair housing law in the manner in which group homes and family homes for persons with mental illness are regulated.

Cuyahoga County has taken and will continue to take actions to address these impediments, within the limits of its available resources. It must be remembered that the 50-member Cuyahoga Urban County is only one of seven entitlement jurisdictions receiving Community Development Block Grant funds in Cuyahoga County. Regional cooperation among these seven entitlement jurisdictions and between adjacent counties in Northeast Ohio is vital to any meaningful Fair Housing strategy. Cuyahoga County has encouraged and will continue to encourage its fellow entitlement jurisdictions to provide a similar level of financial support for fair housing activities, relative to their Community Development Block Grant allocations, as does the Urban County.

Based on its Analysis of Impediments, Cuyahoga County has made a commitment to continue significant financial support for appropriate fair housing activities carried out by qualified nonprofit organizations, and also to review its own housing programs to ensure each supports fair housing to the fullest extent possible.

Annual funding of nonprofit fair housing organizations includes support for activities on all of the following priority areas, to address local and regional fair housing impediments:

1. Advice on landlord-tenant and fair housing issues for tenants in the Cuyahoga Urban County communities, both by telephone and in person at tenant meetings, including outreach and education to inform tenants of their rights and assist them in working together to protect their rights as tenants.
2. Investigation of fair housing complaints from tenants, prospective tenants, homeowners, and prospective homebuyers in the Cuyahoga County Urban County communities, including counseling, negotiation, and assistance in filing and pursuing administrative and appropriate legal remedies. However, the limited funds available will not permit support for actual litigation under this award.
3. Research and investigation to determine whether systematic discrimination exists in specific sectors of the housing and related financial markets, including but not limited to rental management, home sales, mortgage lending, mortgage refinancing, homeowners insurance, and home repair lending.
4. Outreach, education, and/or legal services (limited to counseling and negotiating with lenders) to combat the serious problem of predatory lending, especially among minority and elderly homeowners, including services to specific low- and moderate-income homeowners who are facing serious financial problems and possible loss of their homes due to predatory lending.
5. Consulting services to assist local municipal governments belonging to the Cuyahoga Urban County, with implementation of specific fair housing and diversity promotion initiatives and programs and compliance with fair housing laws in their zoning practices.
6. Outreach and education specifically directed to maintaining the desirability, economic vitality, and social well being of Cuyahoga Urban County communities and neighborhoods undergoing racial change, as well as those communities and neighborhoods that have successfully integrated.

To ensure the most efficient and cost-effective use of its limited federal Community Development Block Grant funds allocated for Fair Housing, Cuyahoga County intends to continue the following funding principles and practices for its nonprofit agency support:

1. Funds will be allocated each year based on a Request for Proposals open to all qualified organizations. Each organization must submit its own funding proposal.
2. Funding agreements will specify payment per unit of service provided, rather than reimbursement of organizational costs, whenever possible and appropriate.
3. Activities will be directed to at least 51% low/moderate income households, or to a limited clientele presumed to be low/moderate income, whenever possible.

Programming

Local nonprofit fair housing organizations, which include the Heights Community Congress, Housing Advocates, and the Housing Research and Advocacy Center, have individual fair housing programs and activities that are held separately and jointly throughout the year. The Cleveland Tenants Organization continues under contract with the Cuyahoga County Department of Development for its Landlord/Tenant Project. The programs of these organizations enhance the fair housing programs of the Cuyahoga Urban County and Cuyahoga County as a whole. The Cuyahoga Urban County funds these and other organizations for various activities, including random testing of discrimination in the rental and home sale markets throughout Cuyahoga Urban County.

HUD regulations require each entitlement grantee to look for potential disproportionate need. This is defined as a group having a percentage of poverty greater than 10% of the jurisdiction's average. The only racial group to have a HUD defined disproportionate concentration of poverty is the American Indian/Eskimo/Aleut group. The census recorded that there were a total of 728 persons out of over 600,000 Urban County residents who stated their race as a member of the American Indian/Eskimo/Aleut group in the 2000 Census. This is an extremely small population group and only 210 persons (28.8%) were identified as persons in poverty.

On another unrelated matter, the Department has several staff members that are fluent in Spanish in both the Economic Development and Housing Divisions. Of the 596,370 persons who declared their ethnicity in the Urban County, only 7,233 (1.2%) indicated a Hispanic origin.