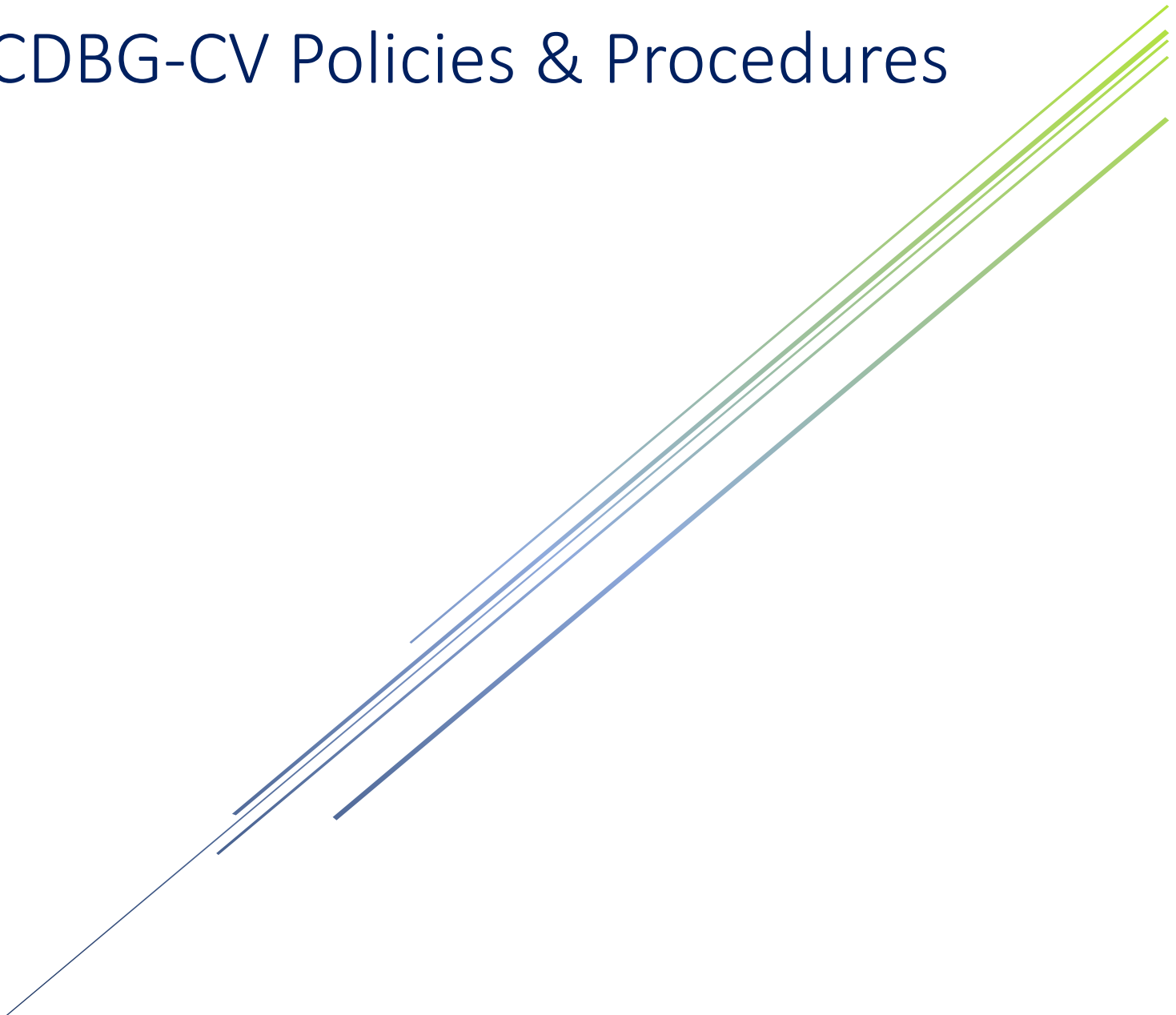


STARK COUNTY

CDBG-CV Policies & Procedures



Adopted June 2021

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Revised October 2022

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COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

POLICIES AND PROCEDURES

The SCRPC is under contract with the Board of Stark County Commissioners for the overall administration of the CDBG-CV program.

The Stark County Regional Planning Commission (SCRPC) has created the Community Development Block Grant COVID (CDBG-CV) Policies and Procedures manual as a guide to help recipients of CDBG-CV funds understand program responsibilities and how the SCRPC Community Development (CD) staff views potential and actual projects. The information in this manual is not a substitute for federal regulations governing the program. Recipients of funds are responsible for compliance with program requirements. Applicants for CDBG-CV program funding are encouraged to familiarize themselves with both this manual and the CDBG-CV regulations.

Policies and procedures contained in this manual apply to all projects receiving CDBG-CV funds through the Board of Stark County Commissioners. Stark County CDBG-CV funded projects must serve persons located outside of the cities of Alliance, Canton, Massillon and the Village of Hills and Dales. Any violation of the CDBG-CV program or policies contained within could result in the repayment of CDBG-CV funds.

Throughout this Policy and Procedure Guide, please note:

“SCRPC CD staff” refers to the Chief of Community Development, Diane Sheridan and Senior Community Development Planner, Lisa Snyder.

“SCRPC rehab staff” refers to the Housing Counselors, Jill Ross and Gwen Arthur and Housing Rehab Inspectors, Wyatt Hayes and Steve Williams.

“SCRPC finance staff” refers to the Chief of Finance, Heather Cunningham and Fiscal Administrator, Barb Buonaspina.

The CDBG-CV Policies and Procedures shall be updated as needed.

Purpose and Goals

INTRODUCTION

Congress provided \$5 billion in the Coronavirus Aid, Relief and Economic Security (CARES) Act for the CDBG program to states, metropolitan cities, urban counties, and insular areas to prevent, prepare for, and respond to Coronavirus.

To increase the efficiency in which CDBG-CV funds are utilized and increase the impact of these dollars, the SCRPC CD staff has developed the following policies and procedures.

Purpose and Goals of the CDBG-CV Program

At least 70 percent of funds must be expended for activities that benefit low- and moderate-income persons by providing housing, a permanent job, a public service or access to new or significantly improved infrastructure. The remaining 30 percent may be used to eliminate slum or blighted conditions, or to address an urgent need for which the grantee certifies it has no other funding.

Activities must prepare, prevent or respond (PPR) to COVID-19 or other infectious diseases

Activities must benefit residents within the jurisdiction of the grantee or as permitted by the CARES Act.

Policies and Procedures

Annual Allocation Limits

-Administration and Planning

No more than 20% can be expended for administrative and planning costs.

Administrative and planning funds are allocated to the SCRPC agency to support the day-to-day administration of the CDBG-CV program.

-Public Service Projects

The public service capped is waived when using CDBG-CV funds.

After deducting administration and planning the remaining CDBG-CV balance shall be allocated to eligible activities.

Eligible Activities

Applicants need to ensure projects meet three prongs of eligibility. All CDBG-CV funded activities must meet a national objective, be an eligible activity and tieback to PPR to COVID-19 and other infectious diseases. Projects that fail to meet any criteria shall be disqualified. Applicants should only request the amount of CDBG-CV funds needed to make the project feasible or the “gap” and PPR to COVID-19 and/or other infectious diseases.

National Objectives:

- Benefit to low- to moderate-income persons and families;
- Aid in the prevention or elimination of slums or blight;
- Activities that meet an urgent need

Public Services:

CDBG- CV funds may only be used for public service activities that are new or represent a quantifiable increase above the level of an existing service that has been provided by or on behalf of the unit of general local government in the 12 calendar months before the submission of the Action Plan, unless the Secretary finds that the discontinuation of such services was the result of events not within the control of the unit of general local government.

Eligible Applicants

The following types of organizations are eligible to apply for funds:

- A public or private nonprofit organization
- Institutions of higher learning
- Eligible political subdivisions

When applying for CDBG-CV funding, a non-profit organization must provide proof of non-profit status, such as a copy of the legal entity’s 501(c)(3) designation.

Joint Applicants

Two or more eligible political subdivisions may submit one application if the project has received endorsement from parties involved.

Eligibility Requirements

Applicants, including those currently administering a project with CDBG funding, are eligible to apply for CDBG-CV funds if:

- The requested CDBG-CV funding shall be utilized to benefit residents of Stark County outside of the corporate limits of the cities of Canton, Massillon and Alliance and the Village of Hills & Dales.
- There are no unresolved audit, monitoring or performance findings for any previous CDBG/HOME funding allocations provided to the applicant.
- All projects must tieback to PPR.
- A certification is required to prevent the duplication of benefits that is caused when a person, household, business or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance is more than the total need.
- Funds must be expended prior to June 30, 2024.

Disclaimers

SCRPC CD staff reserves the right to advise against awarding all available funds if submitted proposals do not meet the project threshold, evaluation, funding criteria or do not address program priorities.

SCRPC CD staff may deny CDBG-CV funds for any project regardless of the ranking score under the project selection criteria if it determines the project is unacceptable based on, but not limited to, the following:

- Negative comments or lack of support from community organization(s) and/or stakeholder(s), or
- The likelihood that the project may not comply with CDBG-CV program requirements in a timely manner, or
- The applicant's, including any related party's, lack of or unacceptable prior experience/performance related to compliance with government-sponsored programs, regardless of type and/or location.

Use of Contractors

CDBG-CV funds shall not be used to employ directly or indirectly, award contracts to, or otherwise engage the services of any contractor, vendor or subrecipient during any period of debarment, suspension or placement of ineligibility status.

Consistent with the Goals of the Consolidated Plan

Proposed projects be consistent with Stark County's priorities as listed in the Consolidated Plan and tieback to PPR. Applicants must familiarize themselves with the Stark County Consolidated Plan. The current five-year plan covers the period of July 1, 2019 to June 30, 2024.

Adopted June 2021

As part of the application submission, HUD temporarily waived the requirements that grantees certify that housing activities to be undertaken with CDBG-CV funds are consistent with the Consolidated Plan.

A substantial amendment to the 2020 Action Plan shall include the CDBG-CV allocation as an available resource for the year. The amendment shall include the proposed use of all funds and how the funds will be used to prevent, prepare for and respond to coronavirus/other infectious viruses. The County shall submit a SF-424, SF-424D and the certifications at 24 CFR 91.225(a) and (b).

Project Time Frame

Applicants must submit a timeline for project completion making reasonable assumptions concerning the scope of the project such as land acquisition, site-preparation, funding cycles, construction time frames etc. An applicant's history in project development and completion shall also be considered. Funds shall not be available until HUD executes a Funding Agreement with the Stark County Board of Commissioners. The applicant shall expend funding within 36 months of project commitment. Any remaining or unused funds as of June 30, 2024 shall be subject to recapture by HUD.

Leverage of CDBG-CV Funds

Leveraging funds is not required when utilizing CDBG-CV.

CDBG-CV FAQs

On August 27, 2020 the Department of Housing and Urban Development issued an Overview and Background of the CDBG-CV Program. The publication can be reviewed [here](#) and shall be utilized by staff while administering the grant.

Application Process

APPLICATION FOR FUNDS

Application Timeline

Applications for funding shall be accepted until December 4, 2020. A notice was published in a newspaper of general circulation on October 19, 2020 notifying the public of such available funding.

Inaccurate information contained in an application shall disqualify the Applicant from consideration. **Applicants who fail to meet any minimum eligibility requirement shall not be considered for funding.** Minor corrections to applications may be allowed, but applications requiring substantial revision or are substantially incomplete shall not be reviewed or ranked. Applicants may contact SCPRC Community Development Department for application questions during the open-application period and/or to receive technical assistance on completing the application. One original proposal with original signatures must be submitted by the deadline to:

Community Development Department
Stark County Regional Planning Commission
201 Third Street, NE
Suite 201
Canton, Ohio 44702
lacarlone@starkcountyohio.gov
and
capuleo@starkcountyohio.gov

Application Workshop

- Notification of the funding shall also be published in a newspaper of general circulation, advertised on the SCRPC website and on social media.

Scoring and Review Process

- Each application shall be reviewed and scored on a 100-point scale by a minimum of three SCRPC agency staff based upon the information provided in the original application. Generally the reviewers are the Chief of CD, Senior CD Planner and a member of SCATS.
- Upon application review from three SCRPC staff members, mentioned above, if clarification is needed from an applicant, correspondence shall be sent requesting specific information by a determined deadline. The applicant shall have the opportunity to answer the questions and/or provide needed information.
- Application scores shall be averaged to arrive at a final score for each application.
- Applications shall be ranked in descending order based upon their final score.

- The final budget and projects will be subject to the discretion of the Board of Stark County Commissioners.

Monitoring

Monthly Status Reports

Monthly progress reports shall be submitted to the SCRPC CD staff with supporting documentation.

Monitoring

SCRPC CD staff shall monitor all CDBG-CV funded projects at least annually. SCRPC CD staff reserves the right to monitor or provide technical assistance to any recipient more frequently. SCRPC may conduct the monitoring on-site or via desk monitoring. The subrecipient shall be provided with a monitoring notification letter. At the conclusion of the monitoring, the subrecipient shall also receive a copy of the monitoring report and a close-out monitoring letter. The subrecipient will have a specific amount of time to correct any deficiencies found during the monitoring.

Payment/Release of Funds

- Funds are disbursed on a reimbursement basis. If the Agency is unable to meet the cost of construction and/or services on a reimbursement basis, payment terms must be discussed and approved by SCRPC CD staff prior to execution of the CDBG-CV contract.
- Agencies must submit one copy of a CDBG-CV Request for Payment form along with copies of supporting documentation to verify expenses. Claims submitted without proper supporting documentation shall be returned to the Agency. Requests for payment must be on the prescribed SCRPC agency form.
- Agencies receiving CDBG-CV funding commitments shall submit requests for payment at their convenience but at least once per month. Failure to draw funds in a timely manner shall result in a reduction of funding.
- SCRPC CD staff may hold any payment, pending project inspection or to review any contract requirements. The funds shall not be released until SCRPC CD staff has received and approved all required documentation.

- Request for payments and status reports may be e-mailed, hand delivered or mailed.

Cost Overruns/Change Orders

- Applicants should make every effort to be realistic and comprehensive when developing project budgets.
- The County has minimal funding allocated to contingencies for cost overruns and does not promise the use of these funds to any project.
- Change orders for materials and/or time must be submitted to SCRPC CD staff and signed by appropriate subrecipient entities. Change orders are presented to the Board of Stark County Commissioners for approval.

Income Determination and Eligibility

Seventy percent of homeowners receiving direct housing assistance through the CDBG-CV program must be income eligible using the most current Section 8 (Part 5) definition of Annual Gross Income. Those who are income eligible must be at or below 80% the Area Median Income (AMI). Income must be verified via third-party documentation (i.e., IRS Form 1040) or must be self-certified. Income requirements shall be consistent for all participants of a project.

Seventy percent of businesses receiving direct CDBG-CV assistance must be located in a lower income area or provide services to lower income persons.

Individuals/businesses assisted must sign a Duplication of Benefits certification and each activity must PPR to COVID-19 or other infectious diseases.

Annual Income Limits

Each year as HUD updates CDBG income limits, SCPRC shall e-mail the updated information to current CDBG-CV subrecipients, if applicable. Subrecipients are responsible for using the appropriate [income limits](#). Addendum 2 has been added for convenience.

Record Retention

All records must be maintained and accessible for a minimum of four (4) years beyond the end of each fiscal year (June 30th) or final disposition, which occurs last.

CAPER

SCRPC CD staff submits a Consolidated Annual Performance Evaluation Report (CAPER) to HUD within 90 days of the completion of each program year. CDBG-CV subrecipients shall provide data to assist with the completion of the CAPER.

Audit Requirements

Recipients of CDBG-CV dollars who also expend \$750,000 or more in federal awards in one year must undergo an annual audit by a qualified CPA. More information regarding audit requirements can be found in [2 CFR part 200](#). SCRPC CD staff shall request a copy of the most recent annual audit as a part of the monitoring process.

General

In the event of turnover in staff administering a CDBG-CV funded project, SCRPC CD staff must be notified within thirty (30) days, or as soon as possible, in order to provide technical assistance to new and/or reassigned staff.

Cross Cutting Requirements

Recipients of CDBG-CV funding are encouraged to research the federal requirements involved with their project before applying. SCRPC CD staff shall provide guidance, however it is the recipients responsibility to ensure all compliance factors are met.

Davis Bacon

Subrecipients shall be informed if [Davis-Bacon](#) requirements apply to the project. It is the applicant's responsibility to become familiar with these legislative acts. SCRPC is committed to following all federal regulations.

Environmental Review Process

The Federal Register Notice clarifies that environmental review regulations in 24 CFR part 58 include two provisions that may be relevant for activities to prevent, prepare for, and respond to coronavirus.

24 CFR 58.34(a)(10) provides an exemption for certain activities undertaken in response to a national or locally declared public health emergency. Except for the applicable requirements of 24 CFR 58.6, a responsible entity does not have to comply with the requirements of part 58 or undertake any environmental review, consultation or other action under NEPA and the other provisions of law or authorities cited in 24 CFR 58.5 for exempt activities or projects consisting solely of exempt activities. Exempt activities include assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from imminent threats to public safety.

A streamlined public notice and comment period is in the regulation at 24 CFR 58.33, which may apply in some cases for emergency activities undertaken to prevent, prepare for, and respond to coronavirus. The application of these two provisions following a presidentially-declared or locally-declared public health emergency is discussed in the FR Notice, Guidance on conducting environmental review pursuant to 24 Part 58 for activities undertaken in response to the public health emergency as a result of COVID-19.

FFATA

SCRPC CD shall require all subrecipients of CDBG-CV funding to supply information subject to the Federal Funding Accountability and Transparency Act (FFATA), regardless of the award amount. Subrecipient information shall be entered into the FFATA Subaward Reporting System (FSRS) and shall be displayed on USASpending.gov. Subrecipients shall be provided the appropriate reporting form which shall be completed and returned to SCRPC CD staff before the CDBG-CV contract is fully executed. Failure to provide required information for FFATA reporting purposes shall result in delayed execution of the CDBG-CV contract.

W/MBE Benchmarks

The County strives to ensure small businesses and Women/Minority Business Enterprises (W/MBE) are aware of contracting and procurement opportunities. Outreach to promote

participation is conducted at least quarterly. Prime contractors receiving CDBG-CV funding are expected promote the same opportunity when searching for subcontractors.

Preconstruction Meeting

Projects involving construction require a preconstruction meeting. Dependent upon the applicant for CDBG-CV funds, SCRPC CD staff and the Procurement Officer may host a preconstruction meeting or attend the off-site preconstruction meeting. In either occurrence, SCRPC CD staff and the Procurement Officer shall be in attendance to review federal cross cutting requirements on the project.

Procurement

Projects involving procurement must follow one of the four procurement methods based upon the value of the products and/or services to be procured:

-Micro purchase procurement: Used for goods and/or services of \$2,000 or less. One quote shall be obtained.

-Small/micro procurement: Used for goods and or/services of \$2,001 -\$150,000. Quotes from at least three qualified sources shall be obtained.

-Competitive sealed bids: Generally used for construction projects for goods and services of more than \$150,000. The availability to bid must be publicly advertised with sufficient time until bid opening. Bids shall be publicly opened and bidders shall be checked for debarment.

-Competitive proposals: Used for professional services that exceed \$150,000.

General procurement guidelines:

- All public construction projects must be sent out for public bid regardless of other funding sources in the project. Bid documents shall be approved by the SCRPC CD staff and the staff attorney prior to advertisement. Failure to receive prior approval shall result in non-compliance and termination of the CDBG-CV contract.
- Bid packets must be available for pickup for a minimum of two (2) weeks.
- Bids must be sealed when submitted to the agency. All bids shall be opened by the agency at a pre-designated date and time.
- SCRPC CD staff and all bidders must be notified of date and time of bid opening.

- The lowest and/or most responsive bidder shall be awarded the contract. In the event the agency selects a bid other than the lowest, they must submit the bids along with documentation to support the selection to the SCRPC CD staff for approval. This may or may not be approved by SCRPC CD staff.

Section 3

Subrecipients shall be informed if Section 3 requirements apply to the project. It is the applicant's responsibility to become familiar with [24 CFR part 75](#). SCRPC is committed to following all federal regulations.

Section 504 and the Fair Housing Act

Subrecipients shall be informed if Section 504 and the Fair Housing Act requirements apply to the project. It is the applicant's responsibility to become familiar with these legislative acts. The County is committed to following all federal regulations.

CDBG-CV Funding Contract

Process

All projects selected for funding must be approved by Board of Stark County Commissioners.

Timeline

Once the CDBG-CV contract is fully executed and funds are released by HUD, recipients may request reimbursement. Construction on public facility/infrastructure projects is expected to begin upon execution of the CDBG-CV contract.

Program Income

Each recipient's CDBG-CV contract shall specify what is to be done with any program income earned.

Legal Notices/Advertisement

Legal notices and advertisements pertaining to a project must be reviewed by SCRPC CD staff prior to publication.

Funding Terms

Subrecipients shall abide by all terms specified in the CDBG-CV contract and those listed in this policy and procedure manual.

CDBG-CV Owner Occupied Housing Rehabilitation

The SCRPC agency manages and operates an in-house owner-occupied housing rehabilitation program and has a separate Policy and Procedure manual for this activity. Septic repair and/or replacements completed by the Stark County Health District will abide by the rehabilitation program manual. Deviations may be granted and shall be determined on a case-by-case basis.

Addendum 1 - Citizen Participation Plan

HUD did not modify requirements for CDBG grantees to mirror the elimination of citizen participation for substantial amendments and new consolidated plan submissions because HUD cannot waive the minimum requirements the CARES Act imposed on CDBG grantees.

The only CARES Act modifications are:

- Permits a public comment period of no less than 5 days when citizen participation is required.
- Permits grantees to develop expedited citizen participation procedures and to hold virtual public hearings when necessary for public health reasons.
- Eliminates the public services cap for coronavirus-related activities.
- Allows states and local governments to reimburse allowable costs of eligible activities regardless of the date the costs were incurred.

Citizen Participation Plan – Adopted 6/2018

The Stark County Regional Planning Commission is under contract to the Board of Stark County Commissioners to administer the HUD funded Community Development Block Grant and HOME programs.

Citizen Participation Plan Development Process

Prior to the adoption of the Community Development Department's Citizen Participation Plan, citizens are given the opportunity to comment. The draft plan is presented to the Stark County Regional Planning Commission (SCRPC) at its March monthly meeting at the same time as the Community Development Block Grant (CDBG) and the HOME Investment Partnership (HOME) proposed programs. The plan is then made accessible to the residents of Stark County through the SCRPC's website and a copy is available in the SCRPC library for a 30 day citizen comment period. As needed, the plan can be made into a format accessible to persons with disabilities, upon request. Any comments made by the public during the 30 day comment period will be addressed by SCRPC staff prior to the adoption of the final citizen participation plan. Furthermore, comments made may not always result in changes to the Plan.

Community Development

Public Participation General Information

One of the main goals of the Stark County Regional Planning Commission's Community Development Department is to provide the community an opportunity to participate in an advisory role in the planning, implementation and assessment of its programs and projects. There are six main programs and/or plans that the Community Development Department undertakes, which include the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership Program (HOME), the Consolidated Plan (5-Year Plan), the Annual Action Plan, the Consolidated Annual Performance Evaluation Report (CAPER), and the Analysis of Impediments to Fair Housing Choice (AI). Please see the list below outlining basic practices and policies utilized by the SCRPC to ensure the public has access and knowledge to programs in their community:

Holding a "public hearing" entails:

- Taking minutes and documenting comments that will be made public record.
- Being required by law on a case-by-case basis.
- Following rules concerning who speaks when and for how long; not a question-and-answer format.
- Providing a hearing official to oversee the hearing.

Holding a "public meeting" entails:

- Not being required by law.
- Not making the discussion between interested parties and comments public record.
- Attendees being able to ask questions and make comments, with the aid of a moderator to keep the meeting focused.

All meetings and hearings held by the Community Development Department are normally during the day and held at the office the Stark County Regional Planning Commission located at 201 3rd St. NE, Suite 201, Canton, Ohio 44702. If necessary, meetings may be held in the evening. By holding meetings/hearings at the SCRPC office building, they are accessible to the community through the following ways:

- SCRPC office building is ADA accessible.
- SCRPC office is accessible to public transportation, including the location of 2 SARTA bus stops within a block of the SCRPC office building (1.) Market Ave. N and 3rd St., being on the West side of the street (2.) Market Ave. N. and 4th St., being on the East side of the street.
- Meetings and/or hearings being held are advertised on the SCRPC's website and the newspaper, when applicable.
- Any documents created by the SCRPC that require public comment are made available on the SCRPC's website as well as copy being available at the office.
- If a non-English speaking community member attends a meeting, they are encouraged to bring a translator. (1.08% non-English speaking households in Stark County, Ohio, according to the 2013 American Community Survey.) If an interpreter is needed, advance arrangements will need to be made.

Community Development Programs/Plans

1.) Community Development Block Grant (CDBG) Program

The Board of Stark County Commissioners is the recipient of the federally funded CDBG program of the U.S. Department of Housing and Urban Development (HUD). The SCRPC is under contract to the Board of Stark County Commissioners to do the overall planning and administration of the CDBG Program. The CDBG program aims at developing viable communities by providing decent housing and a suitable living environment, along with expanding economic opportunities, for persons of low- and moderate-incomes.

Citizen participation is a vital role in the CDBG Program process. As established by Section 104(a)(2) of the Housing and Community Development Act and by regulations at 24 CFR 570.486, there are key actions that need to be taken to ensure that citizens, especially low and moderate income citizens of the community where CDBG funded activities will take place, have an opportunity to participate in an advisory role in the planning, implementation, and

assessment of the program and projects. Therefore, the SCRPC includes the local community in the CDBG Program implementation by taking the following actions:

- Providing 2 public hearings, each at different stages of the program. The first being held during the SCRPC's regularly scheduled monthly meeting in which the CAPER is presented, and the second during the 30 day public comment period of the Annual Action Plan.
- Providing citizens with reasonable advance notice of, and opportunity to comment on proposed activities.
- Providing citizens contact information for submitting complaints and grievances, and then responding to complaints in a timely manner.

Each program year the SCRPC is responsible for:

- Publishing notices for the CDBG application workshop in three general circulation newspapers.
- Mailing invitations to all political subdivisions that participate in the CDBG program along with private non-profit agencies that have applied for funding in the past, or expressed an interest in applying, otherwise known as Stark County CDBG Stakeholders.
- Posting notices on the SCRPC website.

During the application workshop, an application review committee is nominated from volunteers, consisting of 6 members including a representative of each of the following: large township, small township, village, city, county at large and county representative. Alternates are also nominated when available.

A public meeting is held to present the upcoming proposed funding plan and encourage discussion with the attendees. Those in attendance vote on approval of the presented plan. The funding plan is also presented to the SCRPC at the regularly scheduled March meeting. The SCRPC also votes on approval of the presented funding plan and updates to the Citizen Participation Plan.

Notices for a public hearing are then mailed to all entities that submitted an application for either the CDBG or HOME program and to all political subdivisions. Additionally, a boxed ad is also published in all three newspapers advertising the date and time of the public hearing along with details of the funding program and availability of the Citizen Participation Plan. This commences the comment period on the proposed program.

At the end of the comment period and after the comments have been reviewed and considered by the SCRPC staff, the Board formally adopts the final CDBG Funding Program for submission to HUD.

2.) HOME Program

The SCRPC has been designated a Participating Jurisdiction (PJ) within a Designated Consortium under the U.S. Department of Housing and Urban Development's (HUD) HOME Program. Stark County has been participating in this program since its inception in FY 1992. All political jurisdictions within Stark County participate in the County's HOME program except the City of Canton (a separate designated PJ) and the Village of Hills and Dales. HOME funding is utilized for the development of housing for low income person/families.

The SCRPC encourages public participation throughout the application process by:

- Hosting an application workshop.
- Circulating public notices for the application workshop by publishing in three general circulation newspapers as well as the SCRPC's website.
- Mailing invitations to entities who have originally received HOME funding in the past and/or other organizations that have expressed interest in the past in applying for funding; otherwise known as Stark County HOME Stakeholders.
- Posting notice of the workshop on the SCRPC website.

Once applications are received for HOME funded activities within Stark County and the cities of Alliance and Massillon, the staff reviews each application to ensure conformity with the HOME regulations and guidelines.

Because applications are accepted on a yearly basis, the one-year funding program is presented at the same above mentioned Regional Planning Commission meeting in which the CDBG program is presented.

Once the HOME program is presented to the Regional Planning Commission the following occurs:

- A public hearing is held and notices of this are mailed to all entities that submitted an application for either the CDBG or HOME program.
- A box ad is published in all three newspapers advertising the public hearing.
- Citizens are given a 30 day public comment period to make written and/or verbal comments.

At the end of the comment period, the Board formally adopts the final HOME Funding Program. This will be included with the CDBG program in the One Year Update of the Consolidated Plan and submitted to HUD no later than 45 days prior to the start of the County's federal fiscal year (July 1).

CDBG and HOME Substantial Amendments:

An amendment is deemed "substantial" when:

- A program is added or cancelled; or

- A considerable amount of money is being reallocated from one project to another, as determined by the Community Development Department; or
- There is a change to the purpose, scope, location, or beneficiaries of an activity (24 CFR Part 91.505).

Public participation is required when a substantial amendment is needed. The proposed substantial amendment is presented to the Board of County Commissioners at a regular meeting. A public notice of the proposed amendment is published allowing for a 30 day comment period. If comments are received by citizens, they will be considered prior to finalizing the amendment. The Board of Stark County Commissioners votes to approve the amendment which is then published as the final amendment. In cases where urgency is a consideration, the comment period may be reduced to 15 days or less.

3.) Consolidated Plan (CP) (5-year plan) and Annual Action Plan (AAP)

The consolidated plan is a 5-year plan, updated every five years since 1995, in accordance with HUD regulations. The plan provides an assessment of needs in the area, including housing and homeless needs, a housing market analysis, and a strategic plan for the allocation of housing resources within the consortium. The Plan also includes the County's priority community development needs that qualify under the CDBG program. Additionally, there is an assessment of the needs for infrastructure improvement, public facilities, public services, accessibility, economic development, fair housing and planning needs.

The submission of the CP also contains the first year Annual Action Plan. During the next four years only the Annual Action Plan is submitted.

The Citizen Participation for the Annual Action Plan is as outlined within the CDBG and HOME sections of this document. The Annual Action Plan, otherwise known as the "One Year Update" summarizes the activities that the County will undertake utilizing CDBG and HOME funding during each fiscal year.

Citizen participation is critical during the preparation of the Consolidated Plan. Residents are encouraged to participate through the following ways:

- Completing a survey that is made available to groups targeted as able to provide input in terms of homeless, housing, planning, and non-housing community development needs to gather information and comments.
- Attendance at public meetings.
- Public comments are received at public meetings held throughout the period of preparation of the CP.
- All comments and views are considered prior to submission of the CP.

As a result of the public meetings held, objectives and goals of the community are established. In addition to the public meetings, 2 public hearings are held for public comment. The CP is

presented to the Board of Stark County Commissioners, as afterwards, there is a 30 day public comment period. Any comments or views are taken into consideration by the staff and are made note of in the final CP.

At the end of the comment period, the Board decides whether to adopt the final Consolidated Plan and Annual Action Plan.

Consolidated Plan and Annual Action Plan “Substantial” Amendments:

An amendment is deemed “substantial” when:

- There is a change to the allocation priorities or a change in the method of distribution of funds; or
- To carry out an activity, using funds from any program covered by the Consolidated Plan not previously described in the action plan; or
- To change the purpose, scope, location, or beneficiaries of an activity (24 CFR Part 91.505).

Public participation is required when a substantial amendment is needed. The proposed substantial amendment is presented to the Board of County Commissioners at a regular meeting. A public notice of the proposed amendment is published allowing for a 30 day comment period. If comments are received by citizens, they will be considered prior to finalizing the amendment. In cases where urgency is a consideration, the comment period may be reduced to 15 days or less. The Board approves the amendment after the comment period and it is published as a final amendment.

4.) CAPER

The Consolidated Annual Performance Evaluation Report, otherwise known as the CAPER is created annually by the Community Development Department staff and submitted to HUD within 90 days after the end of the program year. Once the draft CAPER has been completed, it is presented to the SCRPC at a regular monthly meeting, after which, the following actions are taken to encourage citizen participation:

- The draft CAPER is made available on the SCRPC website, for at 15 day public comment period.
- During this time, the CAPER draft is advertised in 3 local general circulation newspapers.
- A hard copy of the report is available at the SCRPC office and on the SCRPC website.
- All comments and views of citizens received are included in the final CAPER.

At the end of the comment period, the CAPER is submitted to HUD.

5.) Analysis of Impediments to Fair Housing Choice (AI)

The SCRPC's Community Development Department is responsible for Affirmatively Furthering Fair Housing (AFFH) in Stark County. AFFH is a legal requirement that mandates federal grantees further the purposes of the Fair Housing Act. HUD's AFFH rule provides an effective planning approach to aid program participants in taking meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination. As a result of this rule, SCRPC affirmatively furthers fair housing by providing information, education, counseling and investigative services to the residents of Stark County.

A key part of achieving the goal to affirmatively further fair housing is the preparation of an Analysis of Impediments (AI), which is conducted every 5 years in conjunction with the Consolidated Plan. An AI is a review of a jurisdiction's laws, regulations, and administrative policies, procedures, and practices affecting the location, availability and accessibility of housing, as well as an assessment of conditions, both public and private, affecting fair housing choice. The AI is an action-oriented approach to achieving the goal of eliminating various forms of housing discrimination.

Furthermore, the AI is responsible for assessing the population, household income, and housing characteristics by protected classes. Additionally, it evaluates public and private sector policies that impact fair housing choice, and recommend specific strategies to overcome the effects of any impediments identified.

During the drafting of the AI, it is advertised in 3 local general circulation newspapers to inform the public of a 30-day public comment period. The draft document is made available for review on the SCRPC website and a hard copy is accessible at the SCRPC office. If comments are received by citizens, they will be considered prior to finalizing the AI.

Upon completion of the AI, it is presented during two public meetings. It is presented at the same public meeting as the CDBG and HOME programs and then to the SCRPC at a regularly scheduled meeting. After the public meetings are concluded and the AI is finalized, the SCRPC will affirmatively further fair housing by utilizing the AI to undertake appropriate actions to overcome the effects of any impediments identified through the AI, and maintain records reflecting the analysis and actions taken.

Addendum 2 – 2022 CDBG-CV Income Limits

STARK COUNTY CDBG & HOME INCOME LIMITS

Effective 6/15/2022

1 Person Household

30%	-	\$16,150
50%	-	\$26,950
60%	-	\$32,340
80%	-	\$43,050

2 Person Household

30%	-	\$18,450
50%	-	\$30,800
60%	-	\$36,960
80%	-	\$49,200

3 Person Household

30%	-	\$20,750
50%	-	\$34,650
60%	-	\$41,580
80%	-	\$55,350

4 Person Household

30%	-	\$23,050
50%	-	\$38,450
60%	-	\$46,140
80%	-	\$61,500

5 Person Household

30%	-	\$24,900
50%	-	\$41,550
60%	-	\$49,860
80%	-	\$66,450

6 Person Household

30%	-	\$26,750
50%	-	\$44,650
60%	-	\$53,580
80%	-	\$71,350

7 Person Household

30%	-	\$28,600
50%	-	\$47,700
60%	-	\$57,240
80%	-	\$76,300

8 Person Household

30%	-	\$30,450
50%	-	\$50,800
60%	-	\$60,960
80%	-	\$81,200

Adopted June 2021

Addendum 3 – Septic/Sewer Improvements

The CDBG-CV funded Sanitary Sewer /Septic Improvement Grant Program will be offered as a component of the Stark County Housing Rehabilitation Program. All requirements and conditions applying to the Stark County Housing Rehabilitation Program as outlined in the Guideline Manual effective 11/1/10, as amended apply.

*Socially vulnerable populations are especially at risk during public health emergencies such as COVID-19. Grants will only be made when one of more household member belong to a socially vulnerable population.

The nature of the required repair/replacement must serve to protect the health and/or safety of the household and the public and bring the household up to public health codes.

After- rehab appraisals are not required. Grant funds are limited and will be provided at 100% of project cost.

*Source: https://www.atsdr.cdc.gov/placeandhealth/svi/at-a-glance_svi.html#anchor_1597412177909.