

STARK COUNTY

CDBG Policies & Procedures



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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 program.

The Stark County Regional Planning Commission (SCRPC) has created the Community Development Block Grant (CDBG) Policies and Procedures manual as a guide to help recipients of CDBG funds understand program responsibilities and how the SCRPC Community Development 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 program funding are encouraged to familiarize themselves with both this manual and the [CDBG regulations](#).

Policies and procedures contained in this manual apply to all projects receiving CDBG funds through the Board of Stark County Commissioners. Stark County CDBG 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 program or policies contained within could result in the repayment of CDBG 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, Senior Fiscal Administrator, Barb Buonaspina and Fiscal Administrator Kasie Atkins.

“Labor Standards Compliance Officer” refers to Senior Community Relations Planner, Malia Burgasser.

The CDBG Policies and Procedures shall be updated as needed.

Purpose and Goals

INTRODUCTION

The Community Development Block Grant (CDBG) program was created through the Housing and Community Development Act of 1974. Under the CDBG program, funding is awarded on a formula basis. Stark County became an *Urban Entitlement County* in 1975 and receives a direct allocation of CDBG funding from HUD. The Board of Stark County Commissioners receives the County's CDBG funds and the SCRPC is under contract with the Board of Stark County Commissioners to administer the County's program. All areas of Stark County may participate in the CDBG program with the exception of the cities of Canton, Massillon and Alliance as these cities receive their own CDBG allocation. The villages of Hills and Dales and Wilmot do not participate in the CDBG program.

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

Purpose and Goals of the CDBG Program

Stark County strives to meet HUD's objective of *developing viable urban communities principally for low-to-moderate income persons through decent housing, suitable living environments and expanded economic opportunities*.

Policies and Procedures

Annual Allocation Limits

-Administration and Planning

24 CFR 570.200(g) states that no more than 20% of each annual grant allocation, plus program income, can be expended for administrative and planning costs.

Administrative and planning funds are allocated to SCRPC to support the day-to-day administration of the CDBG program. No administrative funds shall be awarded subrecipients.

-Public Service Projects

24 CFR 570.201(e)(1) states that public service activities are limited to no more than 15% of the total grant allocation, plus 15% of the program income received the preceding program year.

After deducting administration, planning and the public service activities cap, the remaining CDBG balance shall be allocated to eligible activities.

Eligible Activities

Applicants need to ensure projects meet two prongs of eligibility. All CDBG funded activities must meet a national objective and be an eligible activity. Projects that fail to meet both criteria shall be disqualified. Applicants should only request the amount of CDBG funds needed to make the project feasible or the “gap”. Leveraging of other funding sources is encouraged to complete the proposed activities within the contract period. Requesting funds for administration is not permitted.

-National Objectives, per 24 CFR 570.200(a)(2):

- 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

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 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 funds if:

- The requested CDBG 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 villages of Hills & Dales and Wilmot.
- There are no unresolved audit, monitoring or performance findings for any previous CDBG funding allocations provided to the applicant.
- Public service projects that are reapplying for CDBG funding and are not considered a new service, must demonstrate a quantifiable increase in the level of an existing service. Failure to demonstrate this shall result in a rejection of funding.

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. Funds not allocated during a funding cycle may be awarded during a subsequent application cycle. SCRPC CD staff reserves the right to allocate these funds to projects during the year, prior to the next application round.

SCRPC CD staff may deny CDBG 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 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 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. Applicants must familiarize themselves with the Stark County Consolidated Plan. The current five-year plan covers the period of July 1, 2024 to June 30, 2028.

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 Congress passes the budget and HUD releases the funds. The applicant shall be expected to expend funding within 12 months of project commitment. Any remaining or unused funds shall be subject to reallocation.

Leverage of CDBG Funds

Leveraging funds is encouraged and project budgets should reflect the sum of additional sources. Leverage can include state, federal, local, private, in-kind dollars/materials or volunteer hours. Proof of commitment must be provided with the application.

Application Process

APPLICATION FOR FUNDS

Application Timeline

Applications for funding shall be accepted once per fiscal year. The SCRPC CD staff shall hold a request for proposal (RFP) application workshop in late summer-early fall of each year. SCRPC CD staff reserves the right to hold this workshop virtually.

Complete applications shall be due in fall of the same year. The exact due date will be announced at each application workshop.

Applications become the property of the SCRPC. 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. Incomplete applications shall be returned to the appropriate agency and shall be determined to be ineligible. Applicants may contact SCRPC Community Development Department for application questions during the open-application period and/or to receive technical assistance on completing the application. SCRPC reserves the right to establish a cut off date for questions and/or technical assistance prior to the application deadline. One complete, electronic proposal must be submitted via [Neighborly](#) by the established application deadline. This web-based platform is the only method applications will be accepted.

Application Workshop

- SCRPC CD staff shall announce a planned application workshop annually. Notice of the application workshop shall be sent to those on the e-mail list serv.
- During the application workshop, volunteers shall be chosen for the Application Review Committee. Representatives on this Committee will include random volunteers who live and/or work in Stark County. CD staff will strive for four to five volunteers. Alternates to each position may be chosen.
- Attendees shall have the ability to ask questions during the application workshop regarding potential projects.
- Those who attend the application workshop and then submit a CDBG funding application for that program year shall automatically be awarded ten points on their application.

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.
- Upon application review from three SCRPC agency staff members, 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.
- Applications shall be reviewed and scored on a 100-point scale by those serving on the Application Review Committee.
- SCRPC agency staff and the Application Review Committee may meet virtually to discuss all applications.
- 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.

- SCRPC CD staff shall develop a proposed funding plan based on the previous year's fiscal allocation and propose the funded projects to the Board of Commissioners at a work-session.
- Approval of the funding plan is subject to the discretion of the Board of Stark County Commissioners. Higher scoring projects are not guaranteed to be funded.

Monitoring

Monthly Status Reports

Monthly progress reports shall be submitted to the SCRPC CD staff. Recipients shall be asked to provide cumulative annual demographic information for all persons served during the program year.

Annual Monitoring

SCRPC CD staff shall annually monitor all CDBG funded projects. 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 contract.
- Agencies must submit one copy of a CDBG Request for Payment form along with copies of back-up documentation to support the funds requested. Claims submitted without proper supporting documentation shall be returned to the Agency. Requests for payment must be on the prescribed SCRPC form.
- Payment may only be requested for work completed and not for any stored materials.
- Agencies receiving CDBG funding commitments shall submit requests for payment on a quarterly basis but may request funds at their convenience. Failure to draw funds in a timely manner could result in a reduction of funding.
- SCRPC CD and/or Finance 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.
- For all public facility and infrastructure projects that are awarded CDBG funding, CDBG funds will be first in and first paid out to ensure timely expenditure of each annual award from HUD. Public facility and infrastructure projects that are multi-year and/or managed by the Stark County Engineer or Stark County Sanitary Engineer will be exempt from this rule.

Cost Overruns/Change Orders

- Applicants should make every effort to be realistic and comprehensive when developing project budgets.
- SCRPC 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 entities. Change orders are presented to the Board of Stark County Commissioners for approval.

Income Determination and Eligibility

Individuals receiving assistance through the CDBG 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). An income calculator is available at the [HUD website](#) to help with calculating income. Income determination is the responsibility of the agency providing the assistance, not of the SCRPC. Income must be verified via third-party documentation (i.e., IRS Form 1040). Income requirements shall be consistent for all participants of a project.

Annual Income Limits

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

End of Year Letter

Approximately 60 days before the end of each program year, SCRPC shall review the remaining balance of each subrecipient. Subrecipients having significant funds remaining may be provided a letter and shall be advised to invoice the balance before July 1. SCRPC reserves the right to reallocate unused dollars to future eligible CDBG projects.

Record Retention

All records must be maintained and accessible for a minimum of three(3) years beyond the end of each fiscal year (June 30th).

CAPER

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

Audit Requirements

Recipients of CDBG 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

Proposals shall not be accepted from applicants having uncompleted projects that were funded with prior year CDBG funding. In the event of turnover in staff administering a CDBG 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 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

- Environmental and historical reviews must be conducted on every project. SCRPC CD staff shall notify the agency of documentation needed to complete the review. It is the responsibility of the applicant to ensure the SCRPC CD staff has the information necessary to complete the reviews. Environmental and historical reviews shall be

completed prior to the execution of a CDBG contract. Projects shall not commence and funds shall not be expended (federal or non-federal) until the review is completed and HUD releases the funds.

- Construction plans shall be submitted to the SCRPC CD staff as part of the environmental review process. Any changes to the approved plans shall be submitted to the SCRPC CD staff for approval and shall be endorsed by an engineer.
- For projects that require acquisition of land or property, the agency may obtain a purchase option agreement in lieu of full ownership. The agreement shall state the purchase of the property is contingent upon the results of the environmental review and the release of funds by HUD.
- All new construction projects must meet the federal energy efficiency and must meet or exceed building codes as established by Stark County or governing jurisdiction.
- All projects shall address radon as per CPD-23-103.

FFATA

SCRPC CD staff shall require all subrecipients of CDBG 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 the SCRPC CD staff before the CDBG contract is fully executed. Failure to provide required information for FFATA reporting purposes shall result in delayed execution of the CDBG contract.

W/MBE Benchmarks

SCRPC 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 quarterly. Prime contractors receiving CDBG funding are expected promote the same opportunity when searching for subcontractors.

Preconstruction Meeting

Projects involving construction requires a preconstruction meeting. Dependent upon the applicant for CDBG funds, SCRPC CD staff and the Labor Standards Compliance Officer may host a preconstruction meeting or attend the off-site preconstruction meeting. In either occurrence, a representative from SCRPC CD staff 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 \$150,000 or less. 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 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 staff attorney prior to advertisement. Failure to receive prior approval shall result in non-compliance and termination of the CDBG 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 SCRPC CD staff for approval. This may or may not be approved by the 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. SCRPC is committed to following all federal regulations.

CDBG Funding Contract

Process

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

Timeline

The funding timeline will vary and is dependent upon Congress passing the budget and HUD releasing the funds. Unexecuted contracts shall be provided to subrecipients after the annual funding plan is approved by the Board of Stark County Commissioners and funds are released by HUD. The Board Stark County Commissioners shall execute the contracts.

SCRPC finance staff cannot reimburse recipients until funds are release by HUD. Once the CDBG contract is fully executed and funds are released by HUD, recipients may request reimbursement starting from July of that program year. Construction on public facility/infrastructure projects is expected to begin upon execution of the CDBG contract.

Program Income

Each recipient's CDBG contract shall specify what is to be done with any program income earned during the program year.

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 contract and those listed in this policy and procedure manual.

Owner Occupied Housing Rehabilitation

The SCRPC manages and operates an in-house owner-occupied housing rehabilitation program and has a separate Policy and Procedure manual for this activity.

Addendum 1 - Citizen Participation Plan

Stark County Citizen Participation Plan Adopted April 19, 2023

I. Introduction

Lead Agency and Background

The Stark County Regional Planning Commission (SCRPC) is under contract with the Board of Stark County Commissioners, the lead agency, to administer the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) and other HUD related programs. The Citizen Participation Plan (Plan) is subject to the requirements of Title 24: Housing and Urban Development Code of Federal Regulations and Part 91: Consolidated Submissions for Community Planning and Development Programs.

The Plan represents the County's plan for providing for and encouraging all citizens to participate in the development, revision, amendment, adoption and implementation of:

- The Citizen Participation Plan (Plan)
- The Consolidated Plan (CP)
- The Annual Action Plan (AP)
- The Consolidated Annual Performance and Evaluation Plan (CAPER)

The Plan may be amended within the submission of the AP, CP or at any time through an amendment process. Upon request, the Plan shall be provided at no cost, in a format accessible to persons with disabilities or language barriers.

County Contacts

The following contact information can be used to request accommodations for meetings, access to information, request information and documents, complaints, grievances or to provide public comments on the documents discussed in this Plan between the hours of 8am-Noon and 1:00pm - 4:00pm, Monday-Friday. Federal holidays excluded.

Stark County Regional Planning Commission (SCRPC)
201 3rd Street NE, #201
Canton, Ohio 44702
330.451.7031 or 330.451.7247
DMSheridan@starkcountyohio.gov
LCsnyder@starkcountyohio.gov

Online Access

The County shall post draft and final documents discussed in this Plan on its website at www.rpc.starkcountyohio.gov.

Effective Date

Following approval of this Plan by the Board of Stark County Commissioners and HUD, the Plan shall be effective until it is amended or otherwise replaced.

II. Encouragement of Citizen Participation

Background

The Plan must provide for and encourage citizens to participate in the development of the CP, substantial amendment to the CP or AP and the CAPER. These requirements are designed especially to encourage participation by low- and moderate-income persons, particularly those persons living in a revitalization area or in a slum and blighted area and in areas where CDBG funds are proposed to be used, and by residents of predominantly low- and moderate-income neighborhoods. The County shall take appropriate actions to encourage the participation of all its citizens, including minorities and non-English speaking persons, as provided in 24 CFR 91.105, as well as persons with disabilities.

Low to moderate income Individuals (LMI)

The County will actively engage LMIs to participate in HUD funded programs. The County's outreach may include, but not be limited to holding meetings in lower income areas, direct mail to residents of lower income areas, distribution of information to the Stark Metropolitan Housing Authority and agencies providing services to LMIs. In the event of a disaster, the County will follow the guidance issued by HUD.

Non-English Speakers

Reasonable accommodations for people with Limited English Proficient (LEP) shall be made. Residents may contact the SCRPC office five business days prior to a meeting date and request an interpreter be present. Meeting notices and presentation materials will be provided in English and additional languages if requested.

Census data will be analyzed to identify areas where non-English speakers reside. If more than 20% of the County's entitlement population speaks a language other than English, notices and some materials will be translated into that language.

Persons with Disabilities

Meetings shall be made accessible by choosing locations that are ADA compliant and/or virtual, when available. Meeting notices will include contact information for the TTY or [State of Ohio Relay](#) number for those who are hearing impaired. Notices will include the following language:

The County will make reasonable accommodations for sensory-impaired or disabled residents at public meetings. Translation services may be offered upon request and availability. Individuals requiring such accommodations should contact 330.451.7031 or 330.451.7247 five business days prior to the meeting. Ohio Relay can be reached at 800.750.0750 for English or 800.269.0678 for Spanish.

Social Service Agencies and other Organizations

The County shall encourage the participation of local and regional institutions, lower income residents, businesses, developers, nonprofit organizations, philanthropic organizations, community-based and faith-based organizations to participate in the process of developing and implementing the CP. Participation shall be achieved through various alternative means, including but not limited

to in person meetings, virtual meetings, surveys, internet-based feedback, phone conversations, social media and focus groups.

Stark County Metropolitan Housing Authority (SMHA)

The County shall encourage, in conjunction with the SMHA, the participation of public housing residents, resident advisory boards, resident councils, and resident management corporations, in the process of developing and implementing the CP along with other low-income residents of targeted revitalization. The County shall provide to SMHA its affirmatively furthering fair housing strategy, and CP activities related to its developments and surrounding communities so the PHA can make this information available at their public hearing(s) for the PHA Plan. Participation shall be achieved through various alternative means, including but not limited to: in person meetings, virtual meetings, surveys, internet-based feedback, phone conversations, social media and focus groups.

Public Comment

As technology improves, the County shall explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods and the review of program performance.

Public Hearing Notices

The County will publish notices of public hearings, including times, dates and locations, striving for no less than fourteen (14) days prior to the date of the hearing in one newspaper of general circulation. In the event of a disaster, the County will follow guidance issued by HUD.

Public Hearings

In accordance with [24 CFR 91.105\(e\)\(1\)](#), the County shall hold at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing in addition to reviewing program performance. Per 105(e)(1), at least one of these hearings will be held before the proposed CP is published for comment.

The County will strive to hold hearings at times and locations convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance with this Plan. Hearings may be held virtually in order to accommodate those with certain disabilities, long COVID-19 illnesses and without reasonable or affordable transportation.

In the event of a disaster, the County will follow guidance issued by HUD.

Technical Assistance

Technical assistance will be made available by appointment with appropriate staff to assist low- and moderate-income representative groups, agencies or individuals requesting assistance in developing applications/proposals for funding assistance under the CP and/or to provide comments pertaining to documents discussed in the Plan. The County determines the level and types of assistance to be provided at any time based on a number of considerations including, but not limited to staff workloads.

III. The Citizen Participation Plan

Background

The County's Citizen Participation Plan (Plan) outlines the notification procedures by which residents, public agencies and other interested parties will be notified of public hearings and the opportunities available for public to comment on community needs and the documents provided in this Plan. The County shall follow the following procedures below to amend its approved Citizen Participation Plan (Plan).

Amendments

Amendments to the Plan must go through a minimum fifteen (15) day public comment period, including weekends and holidays, after the in person or virtual public meeting. A public hearing is not required but may be held concurrently with the public review of the Consolidated Plan (CP) or Action Plan (AP).

During the public comment period, written or oral comments will be accepted by the County contacts indicated on page 1. Public comments will be considered when feasible and beneficial. The Board of Stark County Commissioners will take action on the Plan after the public comment period.

Edits to the Plan that only update contact information or editorial changes for clarity will not be released to the public for review or comment. In the event of a disaster, the County will follow guidance issued by HUD.

The Plan can be accessed in person at Stark County Regional Planning Commission (SCRPC), 201 3rd Street NE, #201, Canton, Ohio 44702 and posted online at www.rpc.starkcountyoohio.gov.

Displacement of Persons

The County does not anticipate any residential displacement to occur in the near future but it is required to set forth plans to minimize displacement of persons and to assist any persons displaced, specifying the types and levels of assistance the jurisdiction will make available.

Should displacement of residents be necessary as a result of funding a project with CDBG or HOME funds, the County shall compensate residents who are displaced in accordance with [HUD Handbook No. 1378, Tenant Assistance, Relocation and real Property Acquisition](#). The handbook can also be located at www.hudexchange.info.

Submission to HUD

A copy of the County's amended Plan including a summary of written or oral comments received during the public review period, the County's responses and proof of compliance with the comment period requirements, will be submitted to HUD. A summary of any comments not accepted and the reasons therefore shall be included.

IV. Development of the Consolidated Plan (CP)

Background

The Consolidated Plan (CP) presents a coordinated approach for addressing the County's housing and community development needs over a five-year period. A new CP is prepared every five years. It combines, in one report, important information about the County's demographics, as well as information on the housing and other community development needs of its residents.

At or as soon as feasible after the start of the CP public participation process, the County will make the HUD-provided data and any other supplemental information the County plans to incorporate into its CP available to its residents, public agencies and other interested parties. The County may make the HUD-provided data available to the public by cross-referencing to the data on HUD's website or in other accessible formats.

Prior to adopting the CP, the County will make available to residents, public agencies, and other interested parties information that includes:

- The amount of assistance the jurisdiction expects to receive, including grant funds, RLF and program income
- The range of activities that may be undertaken
- The estimated amount that will benefit lower income persons
- Where copies of the CP can be examined

Consultations

During the development of the CP, consultations will occur with, but not limited to the following:

- Stark Metropolitan Housing Authority
- Other assisted housing providers
- Social service providers including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDs and their families, and homeless persons
- Community-based and regionally-based organizations that represent members of protected classes
- Organizations that enforce fair housing laws and other public and private fair housing service agencies
- Broadband Internet Service Providers and organizations engaged in narrowing the digital divide
- Agencies whose primary responsibilities include management of flood prone areas, public land or water resources
- Emergency management agencies
- The Homeless Continuum of Care of Stark County
- Public and private agencies that address housing, health, social service, victim services, employment or education needs of low-income individuals and families; homeless individuals and families, including veterans, youth, and/or other persons with special needs
- Publicly funded institutions and systems of care that may discharge persons into homelessness
- Business and civic leaders

To an extent practicable, the County will consult with the appropriate adjacent units of general local government regarding issues and solutions extending beyond a single jurisdiction. Consultation will include, but not be limited to:

- Adjacent local governments with regard to non-housing community development needs
- Agencies with metropolitan-wide planning responsibilities
- Agencies and child welfare agencies concerned with lead-based paint hazards and identifying housing units in which children have been identified as lead-poisoned

Homelessness Strategy

When preparing the sections of the CP pertaining to the County's homeless strategy and resources available to address homelessness and the needs of the homeless population, the County shall consult with the agencies listed on page 5, above as well as:

- Public and private agencies that address housing, health, social services, victim assistance, employment, and education of LMI and families
- Public and private agencies addressing homeless individuals, families, veterans, youth or persons with special needs
- Publicly funded universities
- Publicly funded institutions that discharge persons into homelessness
- Business and civic leaders

A variety of mechanisms may be utilized to solicit input from entities indicated above. These could include staff participation on coalitions or boards, telephone or personal interviews, mail or online surveys, internet-based feedback, focus groups, virtual meetings and/or consultation workshops.

Public Hearings

In accordance with 24 CFR 91.105(e)(1), the County shall hold at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing in addition to reviewing program performance. Per 105(e)(1), at least one of these hearings will be held before the proposed CP is published for comment.

The County will strive to hold hearings at times and locations convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance to this Plan. In the event of a disaster, the County will follow guidance issued by HUD.

Display and Comment Period

The County will present the draft CP, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft Plan will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the CP may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the CP's content and to submit comments, the County shall:

- Publish a summary of the draft CP in one newspaper of general circulation. The summary shall describe the content and purpose of the CP and must include a list of the locations where copies of the entire CP can be examined
- Make a reasonable amount of free draft copies available at the SCRPC office

- Post a link to the draft CP on social media
- Strive to e-mail County stakeholders indicating the draft CP is posted for review and comments

A concise summary of the participation process, public comments received in writing or orally at public hearings and responses to those comments, as well as comments or views not accepted, will be included in the final draft of the CP.

After the public comment period, the draft CP will be presented to the Board of Stark County Commissioners for consideration and formal action.

No less than 45 days before the start of the County's five-year program cycle, the Plan will be submitted to HUD, unless other guidance is provided by HUD.

Hard copies will be made available, at no cost, to those requesting the draft or approved CP by contacting the individuals on page 1, above.

Criteria for Amendments and Substantial Amendments

Pursuant to [24 CFR Section 91.505](#), the County shall amend its approved CP whenever it makes one of the following decisions:

- Makes a change in the allocation priorities or a change in the method of distribution of funds
- Carries out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan
- Changes the purpose, scope, location or beneficiaries of an activity

The County will treat amendments and substantial amendments equally and use the words interchangeably. Any dollar amount or any changes in the AP will be cause for an amendment. Edits to the CP that only update contact information or editorial changes for clarity will not be released to the public for review or comment.

In the event of a disaster, the County will follow guidance issued by HUD.

Public Hearing Notices

The County will publish notices of public hearings, including times, dates and locations, striving for no less than fourteen (14) days prior to the date of the hearing in one newspaper of general circulation. In the event of a disaster, the County will follow guidance issued by HUD.

Public Hearing

The County will present the draft amendment, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft amendment will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the CP may be received orally or in writing to the contacts indicated on page 1, above.

Public Display and Comment Period

The County will present the draft amendment, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft amendment will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners.

Comments on the amendment may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the draft amendment's content and to submit comments, the County shall:

- Publish a summary of the amendment in one newspaper of general circulation. The summary shall describe the content and purpose of the amendment and will include where the amendment can be examined
- Make a reasonable amount of free amendment copies available at the SCRC office
- Post a link to the draft amendment on social media
- Strive to e-mail County stakeholders indicating the draft amendment is posted for review and comments

A concise summary of the participation process, public comments received in writing or orally at public hearings and responses to those comments, as well as comments or views not accepted, will be included in the final draft of the CP.

After the public comment period, the draft CP will be presented to the Board of Stark County Commissioners for consideration and formal action.

As technology improves, the County shall explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared vision for change in communities and neighborhoods and the review of program performance.

In the event of a disaster, the public display and comment period to amend the CP shall be in accordance with guidance released by HUD.

Submission to HUD

Upon completion of the thirty (30) day comment period and formal action by the Board of Stark County Commissioners, the County shall make the amendment public and will notify HUD that an amendment has been made. A letter transmitting a copy of the amendment(s) will be signed by the President of the Board of Stark County Commissioners and will be forwarded by email or direct mail to the County's HUD CPD representative.

Amendment Access

The revised CP will be kept on file in the Community Development Department, 201 3rd Street, 2nd Floor, NE, Canton, Ohio 44702 and posted online at: www.rpc.starkcountyohio.gov.

Hard copies will be made available, at no cost, to those requesting the draft or approved CP amendment by contacting the individuals on page 1, above.

V. Development of the Action Plan (AP)

Background

The annual Action Plan (AP) is a component of the Consolidated Plan (CP) and it describes the County's proposed use of CDBG and HOME funds available to address the priority needs and objectives indicated in the CP for each year of the year. The AP is the County's method for distributing funds to subrecipients and areas of the County to which it will direct assistance.

Plan Development

In the development of its AP, the County will follow, to the greatest extent feasible the following process and procedures indicated below.

Public Hearings

In accordance with 24 CFR 91.105(e)(1), the County shall hold at least two public hearings per year to obtain residents' views and to respond to proposals and questions, to be conducted at a minimum of two different stages of the program year. Together, the hearings shall address housing and community development needs, development of proposed activities, proposed strategies and actions for affirmatively furthering fair housing in addition to reviewing program performance. Per 105(e)(1), at least one of these hearings will be held before the proposed AP is published for comment.

The County will strive to hold hearings at times and locations convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance to this Plan. In the event of a disaster, the County will follow guidance issued by HUD.

The public hearings conducted for Year one (1) AP may be conducted concurrently with the required public hearings for the five (5) year Consolidated Plan.

Display and Comment Period

The County will present the draft AP, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft AP will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the AP may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the AP's content and to submit comments, the County shall publish, in one newspaper of general circulation that includes:

- A brief summary of the draft AP
- Anticipated funding amounts (including PI and RLF if any)
- The dates of public display and comment period
- The locations where copies of the AP can be examined
- How comments will be accepted
- When the AP will be considered for formal action by the Board of Stark County Commissioners
- The submission date to HUD

Hard copies will be made available, at no cost, to those requesting the draft or approved AP by contacting the individuals on page 1, above.

Comments Received

Written comments will be accepted by the contacts indicated on page 1, above. The County will consider any comments or view made either in writing or orally at the public hearing or during the public comment period. In preparing the final AP, a summary of all feedback will be included, and a summary of any comments or views not accepted and why shall be attached and submitted to HUD.

Submission to HUD

Upon completion of the thirty (30) day comment period and formal action by the Board of Stark County Commissioners, the AP will be submitted to HUD no less than 45 days before the start of the next program year. In the event of a disaster, the County will follow guidance issued by HUD.

The AP will be kept on file in the Community Development Department, 201 3rd Street, 2nd Floor, NE, Canton, Ohio 44702.

Hard copies will be made available, at no cost, to those requesting the AP by contacting the individuals on page 1, above.

Amendments to the Action Plan

Pursuant to [24 CFR Section 91.505](#), the County shall amend its approved AP whenever it makes one of the following decisions:

- Makes a change in the allocation priorities or a change in the method of distribution of funds
- Carries out an activity, using funds from any program covered by the consolidated plan (including program income, reimbursements, repayment, recaptures, or reallocations from HUD), not previously described in the action plan
- Changes the purpose, scope, location or beneficiaries of an activity

The County will treat amendments and substantial amendments equally and use the words interchangeably. Any dollar amount or any changes in the AP will be cause for an amendment. Edits to the CP that only update contact information or editorial changes for clarity will not be released to the public for review or comment.

In the event of a disaster, the County will follow guidance issued by HUD.

Public Display and Comment Period - Amendments

The County will present the draft amendment, in the form of a public hearing, before or during the thirty (30) day comment period. During this time, the draft amendment will be posted for review and written comment for thirty (30) days prior to action by the Board of Stark County Commissioners. Comments on the amendment may be received orally or in writing to the contacts indicated on page 1, above.

During the thirty (30) day public comment period, in order to afford its residents, public agencies, and other interested parties a reasonable opportunity to examine the AP's content and to submit comments, the County shall publish, in one newspaper of general circulation that includes:

- A brief summary of the draft AP amendment
- Proposed funding amounts (including PI and RLF), if any
- The dates of public display and comment period
- The locations where copies of the draft amendment can be examined
- How comments will be accepted

VI. Consolidated Annual Performance and Evaluation Report (CAPER)

Annually, the County will evaluate and report the accomplishments and expenditures of the previous program year for CDBG, HOME and any additional HUD funding in accordance with HUD requirements.

Public Hearing

The County will present the draft CAPER, in the form of one public hearing, before or during the 15-day comment period. During this time, the draft CAPER will be posted for review and written comment for 15 days prior to action by the Board of Stark County Commissioners. Comments on the CAPER may be received orally or in writing to the contacts indicated on page 1, above.

The County will strive to hold the hearing at a time and location convenient to potential and actual program beneficiaries and will accommodate individuals with disabilities and non-English speakers in accordance to this Plan. In the event of a disaster, the County will follow guidance issued by HUD.

Public Display and Comment Period

The draft CAPER will be placed on display for a period of no less than 15 days to encourage public comment and review. Public notice of the display and comment period will be published in one newspaper of general circulation before the comment period begins. The public notice shall include:

- A brief summary of the CAPERs purpose
- The amount of total expenditures
- A summary of the program performance
- The dates of public display and comment period
- The locations where copies of the draft amendment can be examined
- How comments will be accepted
- When the CAPER will be considered for formal action by the Board of Stark County Commissioners
- The submission date to HUD

Comments Received

Written comments will be accepted by the contacts indicated on page 1, above. The County will consider any comments or view made either in writing or orally at the public hearing or during the public comment period. In preparing the final CAPER, a summary of all feedback will be included, and a summary of any comments or views not accepted and why shall be attached and submitted to HUD.

Submission to HUD

The County will be submitted to HUD within 90 days following the end of the County's annual program year. In the event of a disaster the County will follow guidance issued by HUD

CAPER Access

The draft and final CAPER will be kept on file in the Community Development Department, 201 3rd Street, 2nd Floor, NE, Canton, Ohio 44702 and posted online at: www.rpc.starkcountyohio.gov.

Hard copies will be made available, at no cost, to those requesting the CAPER by contacting the individuals on page 1, above.

VII. Complaints

Interested parties may register a complaint regarding any aspect of the CDBG or HOME programs by contacting the individuals indicated on page 1, above. All complaints must be in writing. If a person is unable to provide the complaint in writing for any reason, assistance may be provided. Complaints need to include the resident's name, address, daytime telephone number, if applicable, an email address.

All written complaints will receive a timely written response within fifteen (15) business days of receipt. If staff is unable to be compliant with the fifteen (15) day period, the complainant will be notified of an approximate date a response will be provided.

Addendum 2 – 2024 CDBG Income Limits

STARK COUNTY CDBG & HOME INCOME LIMITS

CDBG Effective 5/1/2024
HOME Effective 6/1/2024

1 Person Household

30%	-	\$18,000
50%	-	\$29,950
60%	-	\$35,940
80%	-	\$47,900

2 Person Household

30%	-	\$20,550
50%	-	\$34,200
60%	-	\$41,040
80%	-	\$54,750

3 Person Household

30%	-	\$23,100
50%	-	\$38,500
60%	-	\$46,200
80%	-	\$61,600

4 Person Household

30%	-	\$25,650
50%	-	\$42,750
60%	-	\$51,300
80%	-	\$68,400

5 Person Household

30%	-	\$27,750
50%	-	\$46,200
60%	-	\$55,440
80%	-	\$73,900

6 Person Household

30%	-	\$29,800
50%	-	\$49,600
60%	-	\$59,520
80%	-	\$79,350

7 Person Household

30%	-	\$31,850
50%	-	\$53,050
60%	-	\$63,660
80%	-	\$84,850

8 Person Household

30%	-	\$33,900
50%	-	\$56,450
60%	-	\$67,740
80%	-	\$90,300

<https://www.hudexchange.info/resource/5334/cdbg-income-limits/>
<https://www.hudexchange.info/programs/home/home-income-limits/>

Addendum 3 – Anti-Displacement & Relocation Plan

Anti-Displacement & Relocation Assistance Plan

The Board of Stark County Commissioners does not anticipate any residential or commercial displacement to occur in the near future but it is required to set forth plans to minimize displacement of persons and businesses; and to assist any persons or businesses displaced, specifying the types and levels of assistance the jurisdiction will make available.

Should displacement of residents or businesses be necessary as a result of funding a project with CDBG or HOME funds, the County shall compensate residents who are displaced in accordance with [HUD Handbook No. 1378, Tenant Assistance, Relocation and Real Property Acquisition](#). The handbook can also be located at www.hudexchange.info.

Addendum 4 – Faith-Based Organizations

PARTICIPATION IN HUD PROGRAMS BY FAITH-BASED ORGANIZATIONS PROVIDING FOR EQUAL TREATMENT OF ALL HUD PROGRAM PARTICIPANTS FINAL RULE EFFECTIVE OCTOBER 30, 2003

- (1) Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to participate in the Community Development Block Grant (CDBG) program. Neither the Federal government nor a State or local government receiving funds under CDBG programs shall discriminate against an organization on the basis of the organization's religious character or affiliation.
- (2) Organizations that are directly funded under the CDBG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytizing, as part of the programs or services funded under this part. If an organization conducts such activities, the activities must be offered separately, in time or location, from the programs or services funded under this part, and participation must be voluntary for the beneficiaries of the HUD-funded programs or services.
- (3) A religious organization that participates in the CDBG program will retain its independence from Federal, State, and local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that it does not use direct CDBG funds to support any inherently religious activities, such as worship, religious instruction, or proselytizing. Among other things, faith-based organizations may use space in their facilities to provide CDBG-funded services without removing religious art, icons, scriptures, or other religious symbols. In addition, a CDBG-funded religious organization retains its authority over its internal governance, and may retain religious terms in its organization's name, select its board members on a religious basis, and include religious references in its organization's mission statements and other governing documents.
- (4) An organization that participates in the CDBG program shall not, in providing program assistance, discriminate against a program beneficiary or prospective program beneficiary on the basis of religion or religious belief.
- (5) Community Development (CD) grants may not be used for the acquisition, construction, or rehabilitation of structures to the extent that those structures are used for inherently religious activities. CD grants may be used for the construction or rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under this part. Where a structure is used for both eligible and inherently religious activities, CD grants may not exceed the cost of those portions of the

construction or rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to CD grants in this part. Sanctuaries, chapels, or other rooms that a CDBG-funded religious congregation uses as its principal place of worship, however, are ineligible for CDBG-funded improvements. Disposition of real property after the term of the grant, or any change in use of the property during the term of the grant, is subject to government-wide regulations governing real property disposition.