

CITY OF CLEVELAND HEIGHTS
COMMUNITY DEVELOPMENT BLOCK GRANT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT
GRANT NUMBER B-21-MC-39-0005
PERIOD COVERED: JANUARY 1, 2021 TO DECEMBER 31, 2021

The City of Cleveland Heights bases the development of its Community Development Block Grant (CDBG) Program on the National Objectives and the Primary Goals established by the U.S. Department of Housing and Urban Development for the CDBG Program and upon the needs established in the City's Five-Year Consolidated Plan. Each year the City, in conjunction with its twenty-two-member Citizens Advisory Committee, reviews the community's CDBG Goals and Objectives. The City of Cleveland Heights' CDBG Certification with HUD specifies that we will give maximum priority to activities that benefit low- and moderate-income persons, specifying that the aggregate use of CDBG funds during program years 2020, 2021, and 2022 shall be a minimum of 70% of our expenditure. In 2021, \$1,197,368.34 or 84% of our expenditures were on activities benefiting low- and moderate-income (LMI) persons.

Having prioritized the National Objectives of the CDBG program in our Goals and Objectives, we have focused as a community on providing funds to activities that benefit low- and moderate-income persons and eliminates slum and blighted conditions. Slum and blighted conditions within the City have been identified through the Investment Target Area (ITA) study last updated in 2012. The City also addressed slum and blight on a spot basis, determining eligibility by using the adopted ITA definition of slum and blight.

Below is a summary of the City of Cleveland Heights' Local Goals.

GOAL I: IMPROVE, MAINTAIN, AND EXPAND AFFORDABLE HOUSING: provide programs for renters and owners, including down-payment assistance, home improvement, weatherization/energy efficiency, accessibility improvements, and correction of building code violations. Eligible areas will receive housing code enforcement services.

GOAL II: REVITALIZE RESIDENTIAL NEIGHBORHOODS: improve the physical condition, health, and safety of neighborhoods with projects such as

improvements to rights-of-way, water and/or sewer lines, and/or public facilities. The City may also fund activities to remediate blighted conditions.

GOAL III: PROVIDE NEEDED PUBLIC SERVICES: focus on the elderly, frail elderly, persons with physical disabilities, persons with developmental disabilities, and low- and moderate-income families with children to improve access to needed public services that improve household stability and educational, work, transportation, healthcare, housing and healthy food access. The City will also assist public service activities on issues such as – but may not be limited to – youth, diversity, food assistance, homebuyer/foreclosure counseling, and fair housing.

GOAL IV: INCREASE ECONOMIC OPPORTUNITIES: provide public infrastructure improvements to aid economic development; assist for-profit commercial enterprises with access to working capital, building rehabilitation and new construction activities designed to create or retain jobs; eliminate substandard or blighted buildings and neighborhood conditions.

These goals and objectives are met through both city programs and with the assistance of a number of subrecipients. Subrecipients in 2021 were: Heights Emergency Food Center, Start Right Community Development Corporation, Open Doors Academy, Family Connections, Gesher, Lake Erie Ink, FutureHeights, and the Home Repair Resource Center. All of our Public Service providers verify income and family size of all program participants. This information is then reported to the City via a monthly report and staff verifies that they are serving at least 51% LMI clientele. All intake forms are available to city staff during monitoring visits as well.

ASSESSMENT OF STRATEGIC PLAN GOALS

GOAL I: IMPROVE, MAINTAIN, AND EXPAND AFFORDABLE HOUSING: provide programs for renters and owners, including down-payment assistance, home improvement, weatherization/energy efficiency, accessibility improvements, and correction of building code violations. Eligible areas will receive housing code enforcement services.

The preservation of housing and the provision of housing opportunities for low- and moderate- income persons are the primary goals for the use of CDBG funds in Cleveland Heights. This report provides data indicating that \$564,273.09 or 34% of Year 47 CDBG expenditures were spent on housing programs. The following programs meet Goal I.

The **Housing Preservation Office (HPO)**, a department of the City of Cleveland Heights, operates the following programs:

Short-Term Deferred Loan (HUD #1329) Short-Term Deferred Loan offers low interest loans for emergency repairs for low- and moderate-income households. Repayment and interest is deferred for two years. There were no loans made in 2021. The activity received \$10,081.83 in program income from loans made in prior years.

Exterior Paint Program (HUD #1328) The Exterior Paint Program provides senior and disabled low- and moderate-income homeowners with a grant of up to \$3,500 for labor and paint. In 2021, the program assisted 30 housing units. It expended \$91,045.00.

Violation Repair Program for Seniors (HUD #1330) This program provides rebates of up to \$2,000 to low- and moderate-income senior and disabled homeowners to complete minor home repairs addressing code violations or health and safety issues. In 2021, this program assisted 20 LMI households with minor repairs and expended \$33,390.00.

Strategic Home Repair Program (HUD #1331) This program expands the eligibility for participation in the HPO Exterior Paint Program and Violation Repair Program to residents that are not elderly or disabled in target areas of the City. In 2021, 11 LMI households were assisted expending \$50,630.00.

HPO Program Delivery Costs (HUD #1327) HPO utilizes CDBG funds for the administration of housing rehabilitation programs that assist low- and moderate-income homeowners, including the CDBG funded Short-Term Deferred Loan Program (HUD #1329), Exterior Paint Program (HUD #1328), Violation Repair Program for Seniors (HUD #1330), and Strategic Home Repair Program (HUD #1331). HPO also administers the HOME Investment Partnership Act Deferred and No Interest Loan Rehabilitation Programs, Down Payment Assistance Program and a HUD funded Lead Safe Cuyahoga Program that benefits low- and moderate-income households.

In 2021, HPO expended \$317,798.95 in operating costs, which included staff salaries and other program delivery expenses. Of this amount \$238,349.21 is LMI (HUD #1327).

HOME Single-Family Rehabilitation

The Federal HOME Investment Partnership Act funds this program. The City of Cleveland Heights is a member of the Cuyahoga County HOME Housing

Consortium. The HOME funds flow to the City of Cleveland Heights through the Cuyahoga County Department of Development. HOME expenditures and completion data are reported through Cuyahoga County. The HOME regulations stipulate that, at a minimum, the housing units be brought up to local housing code. The Single-Family Rehabilitation Program consists of both the Deferred Loan and No Interest Loan Programs described below. In 2021, Cleveland Heights' HOME program generated \$142,428 in program income. These funds will be budgeted and used to expand the HOME program.

Deferred Loan Program. This program provides loans to LMI elderly and disabled homeowners for housing rehabilitation purposes up to \$35,000 per dwelling. The homeowners' repayment of the loan is not required until the home's title is transferred to a new owner. In 2021, 4 single family homes were completed and an additional 5 homes were in the process of being rehabilitated. HOME expenditures totaled \$119,118.

No Interest Loan Program. This program offers no interest loans, from \$8,500 to \$35,000, to LMI households for rehabilitation. There were no loans made in 2021.

Lead Safe Cuyahoga. This program was begun in 2002 and several renewal grants have been received in subsequent years. HPO participates with the Cuyahoga County Board of Health to offer a program addressing lead-based paint hazards in LMI housing. This program is funded through a HUD Lead Grant and progress is reported to HUD through Cuyahoga County. Low- and moderate-income households that have children under the age of six residing in them are eligible for a grant of up to \$9,000 for lead remediation repairs.

The City entered into 2 applicable agreements with the Cuyahoga County Board of Health for Lead Hazard Control and Healthy Homes Grant for the periods September 4, 2018 to September 3, 2021 and April 1, 2020 to September 30, 2023. In 2021, HPO completed 11 projects, expending \$118,905.45 in Lead Safe and Healthy Homes funds, leveraging \$17,904.55 in private funds.

The **Home Repair Resource Center (HRRC)** operates the following programs as a subrecipient to encourage home maintenance and rehabilitation.

ASSIST Incentive Grants (HUD #1323) this program offers a grant of \$500 to \$1,500 as an incentive for LMI homeowners to complete major repairs including: roof, plumbing, electrical and/or heating systems. This program is used in conjunction

with other programs offered by HRRC. In 2021, \$14,375.00 was expended assisting 12 homeowners.

Senior Home Stability Grant (HUD #1325) This program offers a matching of up to \$1,500 to assist seniors or permanently disabled homeowners with critical repairs that are not covered by other senior grant programs. The goal of this program is to provide leverage funding as an earlier-stage intervention to address issues before they grow in cost, complexity and seriousness. The grant covers 50% of the cost of repairs up to a maximum of \$1,500. Eligible projects include water heater replacement, roof replacement and more. A total of \$500 was spent to assist 1 household during 2021.

Major Systems Deferred Loan Match Program (HUD #1324) This program allows deferred payments for up to one-half the cost of replacing major systems for LMI homeowners (i.e., heating, electrical, plumbing, roofs). The maximum loan amount is \$8,000. The program assisted 1 LMI household in 2021. The program expended \$3,330.00 in 2021 and received \$0.00 in program income.

Home Repair Resource Center (HRRC) Program Delivery Costs (HUD #1321) CDBG funds are provided to HRRC to maintain housing rehabilitation program operations and services including the ASSIST Incentive Grant (HUD #1323), the Senior Home Stability Grant (HUD #1325), and the Major Systems Deferred Loan Match (HUD #1324). During 2021, HRRC continued coordination efforts with the City's HPO by assisting with client intakes for HPO rehabilitation programs. In 2021, HRRC expended \$131,408.62 for their LMI administrative costs that included staff salaries and administrative expenses.

FutureHeights - FutureHomes Program (HUD #1309) This program funds the FutureHeights CDC for the purchase, rehabilitation and sale or rent of homes to LMI households. In 2021, funds were incurred for the environmental, historic preservation and lead risk evaluation of a potential rehabilitation project. In 2021, \$1,245.26 was expended and no projects were completed.

Homeownership for low- and moderate-income households is also encouraged.

The City has a goal of assisting low- and moderate-income homebuyers. To that end, the City of Cleveland Heights utilized HOME funds to assist low- and moderate-income households to purchase homes. HRRC manages this program for Cleveland Heights. HRRC is reimbursed up to \$500 for direct program management costs and up to \$500 for housing counseling services for each completed down payment loan. The program provides up to \$10,000 of down payment assistance for single-family homes. The homebuyer must provide 3.5% of the sale price from personal funds. No down payment assistance loans were

made in 2021.

Cumulatively, \$564,273.09 or 34% of CDBG funds was expended on Goal I: Improve, Maintain, and Expand Affordable Housing. 100% of the expenditures for GOAL I qualify as benefiting low- and moderate-income households.

GOAL II: REVITALIZE RESIDENTIAL NEIGHBORHOODS: improve the physical condition, health, and safety of neighborhoods with projects such as improvements to rights-of-way, water and/or sewer lines, and/or public facilities. The City may also fund activities to remediate blighted conditions.

This goal has been maintained through the use of general funds and other sources of funding from the City of Cleveland Heights. CDBG funds assist physical improvements that provide safe and healthy neighborhoods. In 2021, a total of \$486,631.16 or 29% of the total CDBG expenditures was used for this objective.

Nuisance Abatement Program (HUD #1333) The program allows the City to remediate health and safety issues at properties, such as the boarding up of doors, windows, etc. on homes where break-ins have occurred, the emergency repair of dangerous conditions and the removal of trash, all in order to prevent further damage to the property and blight to the area. If the City is not reimbursed for the costs associated with remediation, a tax lien is placed on the property and funds are recovered through property tax repayment. There were 97 emergency nuisance board ups/clean ups in 2021. \$8,189.42 was earned in program income and the program expended \$31,075.00 during 2021.

HPO Program Delivery Costs (HUD #1326) HPO administers the CDBG funded Nuisance Abatement Program (HUD #1333) Also, HPO has a Violation Counselor who works with homeowners whose properties have been identified through the City's exterior housing inspection program as not meeting the local housing code. These programs address the slum and blight objectives.

In 2021, HPO expended \$317,798.95 in operating costs, which included staff salaries and other program delivery expenses. Of this amount \$79,449.74 is Slum and Blight Prevention and Removal (HUD #1326) and \$238,349.21 is for LMI housing benefit (HUD #1327).

LMI Code Enforcement (HUD #1332) This program uses CDBG funds to pay for staff salaries and administrative expenses for a Housing Inspector who conducts systematic inspections for health and safety violations in LMI census block groups of the City. In 2021, \$66,463.71 was expended for this activity. 1,231 inspections

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were conducted in 2021 producing 2,923 violations. 1,885 violations were corrected as of December 31, 2021.

Annual Streets Improvement Program (HUD #1339 & 1340) CDBG funds were used to leverage the City's annual street improvement program. These funds were targeted to two projects: the replacement of water lines and the street surface in an LMI neighborhood, and accessibility improvements that improve the quality of life for persons with mobility disabilities and vision impairment. In 2021, \$108,039.03 of CDBG funds were utilized for the waterline and street replacement of the LMI portion of Shannon Road benefitting 665 residents (HUD #1339), 71% of which are LMI households.

In 2021, \$191,735.56 in CDBG funds was expended to install and replace ADA compliant curb ramps throughout the City benefitting approximately 4,990 estimated people with physical mobility disabilities (HUD #1340). This program is intended to be a 5-year program to address all of the substandard crossings throughout the City. This project qualifies as serving a LMI population because it primarily aids the presumed benefit class of persons with a severe disability.

FutureHeights – Noble Road Early Action Project (HUD #1310) This project funds the purchase and installation of benches in LMI areas along the Noble Road Corridor in order to provide areas of rest for those experiencing physical mobility disabilities while also promoting community cohesion. In 2021, \$9,868.12 was expended in order to install 8 benches, serving approximately 6,460 people, 54% of which are from LMI households.

GOAL III: PROVIDE NEEDED PUBLIC SERVICES: focus on the elderly, frail elderly, persons with physical disabilities, persons with developmental disabilities, and low- and moderate-income families with children to improve access to needed public services that improve household stability and educational, work, transportation, healthcare, housing and healthy food access. The City will also assist public service activities on issues such as – but may not be limited to – youth, diversity, food assistance, homebuyer/foreclosure counseling, and fair housing.

The following public service activities offer services for seniors, youth, refugees, people facing food insecurity, people seeking housing counseling services and other LMI households. In 2021, \$182,355.00 of CDBG funds were expended on public services activities representing 11% of total CDBG spending.

All of our Public Service providers verify the income and family size of all program participants. This information is then reported to the City via a monthly report and

staff verifies that they are serving at least 51% LMI clientele. All intake forms are available to city staff during monitoring visits at their sites.

Housing Counselor (HUD #1322) HRRC operates this program counseling residents on financial literacy, first-time homebuyer issues, budgeting for home repair projects and other appropriate topics. HRRC is a HUD approved housing counseling agency. This program expended \$24,996.00 in 2021 and assisted 308 people of which 84% were LMI. This activity is classified as a public service and qualifies by serving LMI clientele.

Office on Aging - Senior Services (HUD #1319) CDBG funds are provided to the City's Office on Aging for social workers that assist low- and moderate-income seniors access necessary services to maintain a healthy and safe living environment. This allows seniors to live as independently as possible in their homes. In 2021, 338 unduplicated senior adults were assisted by the Office on Aging, 89% of which were LMI. This activity qualifies as serving LMI limited clientele. In 2021, the service expended \$26,929.13.

Heights Emergency Food Center (HUD #1317) The Heights Emergency Food Center (HEFC) provides low-income households with a three-day supply of food one time per month. This activity qualifies as serving LMI limited clientele with income being verified through documentation of family size and income. The City provided funds to the Center for the operation of the program, totaling \$27,114.67 in 2021. This program served 6,379 meals to extremely low-income persons last year.

Start Right Community Development Corporation Food Program (HUD #1316) The Start Right CDC Food Program provided extremely low-income households with a three-day supply of food one time per month. This activity qualifies as serving LMI limited clientele with income being verified through documentation of family size and income. The City provided funds to the Hunger Center for the operation of the program, totaling \$14,000.00 in 2021. This program served 1,245 meals to low-income persons.

Gesher (HUD #1318) Gesher is a benefits referral program which helps families facing financial hardships access assistance from local, state and federal benefit programs. CDBG funds assist with the operation of the program. In 2021, \$23,333.32 1,371 persons were assisted of which 96% were low-to-moderate income persons.

Open Doors Academy (HUD #1313 & #1314) Open Doors Academy operates two after-school programs, one for middle school youth (#1313) and one for high school youth (#1314). Open Doors Academy (ODA) provides scholars the

necessary academic and socio-emotional support that puts them on a path to high school graduation, post-secondary education/career training, and professional success. In 2021, the middle school program served 464 students (duplicated counts), of which 81% are from LMI households, expending \$15,000.00. In 2021, the High School Program served 130 students (duplicated counts), of which 78% were from LMI households, expending \$11,250.00. These activities qualify as serving LMI limited clientele with income being verified through documentation of family size and income.

Family Connections (HUD #1311 & #1312) In 2021, Family Connections operated two programs, the Family-School Connection (#1311) and the Parent Café (#1312).

The Family-School Connection (#1311) offers school-based parent-child interactive programs, encouragement of literacy-building interactive activities, promotes family literacy through literacy evenings, school-based parenting education classes and offers transition activities for incoming kindergarteners and their families. This qualifies as serving LMI limited clientele with income being verified through documentation of family size and income. In 2021, this agency served 424 children (duplicated count). Of the 424 children served 78% were from LMI households. \$25,000 of CDBG funds were expended on this program in 2021.

The Parent Café (#1312) is a gathering of parents, for parents and by parents. It is a parent education experience designed to create opportunities for parents to connect, share and learn from each other. It provides a safe space and appreciates that all parents have something to offer and have what they need to be successful parents. Parent Cafes are driven by the knowledge that parents, can, must and do tap into their wisdom and resources in order to strengthen their own families. This qualifies as serving LMI limited clientele with income being verified through documentation of family size and income. 14 families were assisted in 2021, of which 86% were reported as being LMI households. \$5,000 of CDBG funds were expended for this program in 2021.

Lake Erie Ink (HUD #1315) The Ink Spot After School Program provides literacy enrichment, creative expression and academic support to youth, ages 8-12, at Noble Elementary School and Monticello Middle School. In 2021, the program served 400 youth (duplicated counts), of which 51% were from LMI households. \$1,296.25 of CDBG funds were expended on this activity in 2021.

WAVE Mentoring Program (HUD #1320) The We Are a Village of Efficacy (WAVE) mentoring program provides in-school and out-of-school, interactive, social-emotional based, enrichment sessions geared towards males and females ranging from elementary school (5th grade) to high school (12th grade). The

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sessions consist of a council where young men and women are able to express their feelings and thoughts, a hands-on activity or sport to release stress and channel their capacity to play fair and work together as a team, as well as a meditation/visualization component that supports them in applying the principles of the sessions to their lives. WAVE also implements summer time camps and facilitates project-based, service-learning programs. In 2021, \$8,435.63 was expended benefitting 22 individual young adults.

GOAL IV: INCREASE ECONOMIC OPPORTUNITIES: provide public infrastructure improvements to aid economic development; assist for-profit commercial enterprises with access to working capital, building rehabilitation and new construction activities designed to create or retain jobs; eliminate substandard or blighted building and neighborhood conditions.

The accomplishments of this goal, and its objectives, are primarily carried out through the City's Departments of Planning and Development, which seek to improve and stimulate commercial areas in Cleveland Heights with an emphasis on revitalizing and renovating the nine commercial districts. These improvement projects attract and retain businesses and jobs, thereby facilitating the stabilization and viability of the surrounding neighborhoods. Goal IV represented \$184,433.36 or 11% of CDBG spending in 2021.

Storefront Renovation Rebate Program - S/B (HUD #1337) This program offers rebates up to 50% of the total project costs, up to a maximum of \$40,000 per storefront, for exterior renovations to blighted properties. These buildings are determined to be blighted, on a spot basis, through an approved survey. 4 projects were undertaken in 2021 with 1 being completed by December 31, 2021. The completed project was 3970 Mayfield Road (7 storefronts). The 3 projects still underway are 1429 Warrensville Center Road (3 storefronts), 2066 South Taylor (1 storefront) and 3216 Silsby Road. All Storefront projects have experienced delays due to the COVID-19 pandemic. In 2021, the program expended \$13,193.08.

Storefront Renovation Loan Program - S/B (HUD #1338) This program offers 0% loans for exterior renovations throughout the City to assist buildings that, through an approved survey, are demonstrated to be blighted on a spot basis. 4 projects were undertaken in 2021 with 1 being completed by December 31, 2021. The completed project was 3970 Mayfield Road (7 storefronts). The 3 projects still underway are 1429 Warrensville Center Road (3 storefronts), 2066 South Taylor (1 storefront) and 3216 Silsby Road. All Storefront projects have experienced delays due to the pandemic. \$45,700.80 was expended in this program in 2021. \$40,732.11 in program income was received in 2021 due to this program.

Commercial Revolving Loan Program (HUD #1336) This program provides gap financing utilizing a CDBG funded revolving loan fund in order to assist businesses create or retain jobs available to LMI job seekers. No projects were funded in 2021. This program received \$144,826.54 in program income in 2021.

Economic Development Program Delivery Costs (HUD #1334 & #1335) CDBG funds provide salaries and supplies for economic development program operations, including the Storefront Renovation Program (HUD #1337) and the Commercial Loan Program (HUD #1336). In 2021 CDBG contributed \$123,159.01 to economic development program delivery costs. Of this amount, \$72,253.36 was for LMI activities (HUD #1334) and \$50,905.65 was for slum and blight activities (HUD #1335).

FutureHeights – Small Business Outreach Program (HUD #1299) FutureHeights began implementing a technical assistance program for small businesses in 2021. This program seeks to connect businesses to public and foundation assistance and better connect small businesses to the needs of the neighborhoods in which they are located. In 2021, CDBG contributed \$2,380.47 to this program. 15 businesses were assisted in 2021.

ADMINISTRATION, PLANNING AND FAIR HOUSING ACTIVITIES

The total CDBG administration, fair housing and planning costs in 2021 were \$248,816.80 or 15% of the total CDBG entitlement amount expended.

CDBG Administration (HUD #1304) During 2021, \$89,787.96 was expended for the ongoing administration of the City's CDBG program including salaries, operating costs and planning costs.

CDBG Indirect Costs (HUD #1256) During 2021, \$35,000 was used to facilitate the CDBG program's operations. We have had a HUD approved Indirect Cost plan in effect for many years. Each year, the City of Cleveland Heights Finance Department forwards copies of this document to HUD.

CDBG Financial Administration (HUD #1305) Funds provide accounting and financial services to assist the administration of the City's CDBG program. In 2021, \$13,309.58 was expended.

Geographic Information Systems (HUD #1306) Funds assist in administering and evaluating the current CDBG and HOME programs through the use of GIS and to assist in planning for future programs. In 2021, \$35,126.58 was expended.

Cedar Lee Mini-Park Planning Project (HUD #1341) During 2021, \$3,458.57 was expended to plan and design a potential renovation and enhancement of a small park located in the Cedar-Lee Business District. The park is located in a LMI area.

Fair Housing Activities (HUD #1307) A total of \$30,750.77 was expended for Fair Housing programs in 2021. Funds were expended for diversity education, fair housing testing (14 rental tests and 14 sales tests), racial equity and inclusion training and fair lending advocacy and monitoring.

FutureHeights Community Capacity Building Program (HUD #1308) The FutureHeights Community Capacity Building Program works to help Cleveland Heights residents and neighborhoods to leverage assets and provide tools to enable neighborhood leaders to work together on creative solutions to issues in the community. This program works to encourage historically underrepresented residents to participate in civic life through membership in boards and commissions, including the City's CAC. Participants learn about many facets of local government and civic engagement, particularly the City's CDBG program. CDBG funds are used for administrative expenses. In 2021, a total of \$41,383.34 was expended.

Neighborhood Stabilization Program (NSP)

In 2009, Cleveland Heights received \$2,351,526 in NSP 1 Funds through the Ohio Department of Development. Twelve houses were renovated and sold to income eligible households whose income was at or below 120% of the median income for Cleveland Heights. Funds received from the sale of these homes were used to expand the program and enabled the acquisition of two additional homes that were renovated with a combination of NSP 3 funds and NSP 1 program income. The City received \$250,000 of NSP 3 funds through Cuyahoga County. Both of these renovated houses were sold to income qualified homeowners.

NSP funds and NSP program income were also used to demolish 84 blighted properties through 2014. In 2015, six housing units were demolished and one commercial structure.

On June 26, 2017 the Ohio Development Services Agency officially closed out the NSP 1 grant determining that the activities were completed as specified in the grant agreement, applicable laws, statutes and executive orders appear to have been followed and the capacity of the City of Cleveland Heights to administer

an Office of Community Development program continues to exist. A small balance of NSP 1 program income, \$2,946.13, remains unspent. With approval, we anticipate moving these funds will to our CDBG program and budgeted to appropriate activities.

It is anticipated that Cuyahoga County will complete the close-out of the NSP 3 grant in the near future.

AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)

The City of Cleveland Heights is committed to fair housing. The City has staff that work to encourage fair housing and has established a Fair Housing Board which is charged with the following duties:

- To investigate all complaints which are filed with it pertaining to discrimination in housing;
- To endeavor by conciliation to resolve complaints when appropriate; and
- To recommend action to be taken through local, state and federal court.

In 2014 the City expanded the role and jurisdiction of the Fair Housing Board (now called the Fair Practices Board) to hear and investigate complaints concerning discrimination in places of public accommodation as well as in a housing context.

The City of Cleveland Heights completed an update to our *Analysis of Impediments to Fair Housing Choice* in 2020. This document was produced in partnership with the Fair Housing Center for Rights and Research. The observations collected during the development of the AI constitute the potential impediments or barriers to fair housing choice listed in this section. These impediments are linked to remedial strategies in the Fair Housing Action Plan.

1. *Impediment: The City of Cleveland Heights Has Limited Accessible Housing Options for People with Disabilities*

The housing stock in Cleveland Heights is old (97.8% of all housing was built before 1990) and most homes are unlikely to be built to be accessible for people with physical disabilities. Additionally, approximately 90.0% of all housing with five or more units was built prior to 1980, before requirements under the Fair Housing Amendments Act required multi-family housing with four or more units be built with accessibility features. Regional demand for accessible housing far exceeds the availability of accessible units.

Recommendations:

- Continue providing home improvement loans and rental restoration loans for owners and landlords with tenants with disabilities.
- Ensure that landlords are complying with the reasonable modification requirements for people with disabilities under the Fair Housing Act.
- Ensure that all new construction of covered multifamily housing is built in accordance with the Fair Housing Act Accessibility Guidelines and that public spaces comply with 504 and ADA requirements.
- Require that new single-family construction is built with accessibility features.

The City is currently exploring rehab programs and tax incentives that could specifically be utilized for accessibility. The City is also implementing a Complete and Green Streets Policy that emphasizes accessibility in public spaces. Additionally, the City continues to enforce the Americans With Disabilities Act (ADA) through the building permit process.

2. *Impediment: The City of Cleveland Heights' Fair Housing Ordinance does not Protect Housing Voucher Program Participants*

Housing Choice Voucher units comprise 8.5% of all rentals in Cleveland Heights. Cleveland Heights is home to 4.7% of housing voucher participants in the County. Fair Housing Center research has shown that renters using Housing Choice Vouchers are denied housing by landlords in Cuyahoga County 9 out of 10 times. The population of housing voucher program participants in Cleveland Heights fell 17.8% between 2012 and 2018. Participants in the Housing Choice Voucher Program (HCVP) in Cuyahoga County are 89% African American. Discrimination against HCVP participants contributes to racial segregation in Cuyahoga County, and research shows that landlords who refuse to accept housing vouchers are more likely to discriminate against black renters in general.

Recommendation:

- Amend the City's fair housing ordinance to prohibit discrimination against persons using housing choice vouchers by expanding Cleveland Heights' fair housing ordinance to include "source of income." Ensure that "source of income" is defined as including all lawful sources of income AND rental assistance from any federal, state, or locally administered benefit or subsidy program.

Legislation was passed on April 19, 2021 adding Source of Income to the City's fair housing ordinance (Ord. 25-2021).

Impediment: Criminal Activity Nuisance Ordinance

The City of Cleveland Heights has a criminal activity nuisance ordinance (CANO). In cities across the United States, CANO's have been shown to disproportionately affect people of color, people with disabilities, and survivors of domestic violence. The City of Cleveland Heights has already removed "domestic violence" as a nuisance activity as a way to protect survivors of domestic violence.

Recommendation:

- Monitor enforcement of CANO implementation to ensure law is uniformly enforced and not disproportionately affecting protected groups.*
- Stop threatening renters with removal under the CANO in the Good Neighbor Guide for Residents of Cleveland Heights.*

In 2021, the City continued to monitor the City's CANO implementation.

- 3. Impediment: Low-income residents of Cleveland Heights are displaced by eviction and housing costs.*

In 2017, 47.1% of renters, 28.6% of owners with a mortgage, and 16.8% of owners without a mortgage were housing cost-burdened. In 2010 (last available year for data breakdown), 47.2% of African Americans living in Cleveland Heights experienced "housing problems" as defined by the Census Bureau, meaning almost half of African American households in the City are housing cost-burdened and live in a unit with a deficiency. In 2017 in Cleveland Heights, 893 households faced eviction.

Recommendation:

- Require inclusion of affordable units in new multi-family construction.*
- Continue to use CDBG and HOME dollars to build new affordable housing as funds allow.*
- Consider implementing a "Right to Counsel" for eviction proceedings, i.e. publicly provided representation in cases of evictions for household that cannot afford an attorney.*

- *Prioritize settlement between parties over eviction judgements in eviction cases.*

A temporary Pay-to-Stay ordinance was passed in 2021. Additionally, the Legal Aid Society of Cleveland has been contracted in order to expand their eviction prevention efforts in Cleveland Heights including counseling, education and legal representation.

AFFORDABLE HOUSING

The accomplishments achieved in Cleveland Heights with HUD funds include the maintenance and retention of affordable housing as described in Title II of the National Affordable Housing Act. The housing programs funded with CDBG, HOME and Lead Safe Cuyahoga funds assist low- and moderate-income homeowners with the rehabilitation of their homes. These programs directly assist low- and moderate-income homeowners to maintain their homes through activities such as below market interest rate rehabilitation loans, an exterior paint program grant and providing services to the elderly and disabled that assist them to remain in their homes.

The City has determined that our area of greatest need is that of owner-occupied housing. We are a community with a wide variety of housing opportunities including: apartment buildings, modest single-family homes, two-family homes, medium priced to very high-end single-family homes and condominiums. Most of our housing was built prior to 1945 and therefore home repairs can be a barrier to low- and moderate-income homeowners. Housing rehabilitation costs are barriers that we are addressing to assist low- and moderate-income households remain in their homes.

Additionally, high property tax rates, due largely to the method of public-school funding in the State of Ohio, creates an additional cost burden on all households, particularly low- and moderate-income households.

In 2021, 89 low- and moderate-income households were assisted to maintain their affordable homes through the CDBG, HOME and Lead Safe Cuyahoga rehabilitation programs.

The City has a goal of assisting low- and moderate-income homebuyers. To that end, the City of Cleveland Heights utilized HOME funds to assist low- and moderate-income households purchase homes. HRRC manages this program for Cleveland Heights. HRRC is reimbursed up to \$500 for direct program management costs and up to \$500 for housing counseling services for each completed down payment loan. The program provides up to \$10,000 of down

payment assistance for single-family homes. The homebuyer must provide 3.5% of the sale price from personal funds. In 2021, no LMI homebuyers participated in the down payment assistance program. This is largely due to the prevalence of cash transactions and the proliferation of non-FHA loans due to their lack of home inspection requirements.

Cleveland Heights worked with HRRC to become a HUD Certified Housing Counseling Agency several years ago. The City helps fund this activity with CDBG dollars.

CONTINUUM OF CARE

The Cuyahoga County Housing Consortium, which includes the cities of Cleveland Heights, Euclid, Lakewood and Parma as well as the 50 suburban communities that comprise the Cuyahoga County Urban County, coordinates with the Cleveland/Cuyahoga County Office of Homeless Services to ensure that any homeless persons within those jurisdictions receives assistance. The Cleveland/Cuyahoga County Office of Homeless Services (OHS), a division within Cuyahoga County government, serves all 59 communities within Cuyahoga County. The OHS also coordinates the Cleveland/Cuyahoga County Continuum of Care, an extensive network of public, private and non-profit agencies that facilitate and/or provide, either directly or indirectly, assisted housing, health services and/or social services to persons in Cuyahoga County who are chronically homeless, homeless or are at-risk of homelessness.

Services offered by Cleveland/Cuyahoga County Office of Homeless Services (OHS) assist Cleveland Heights residents who are in need. These services include Emergency Solutions Grants, Shelter Plus Care and Transitional Housing. The Continuum of Care Review and Ranking Committee makes recommendations regarding agencies seeking new or renewal funding for their services. This is a countywide coordinated approach addressing homelessness through a continuum of care funded by the Department of Housing and Urban Development.

Also, the Center for Families and Children in Cleveland Heights is the lead agency in a partnership with the Cleveland Heights-University Heights Family Collaborative. Together with the Cuyahoga County Department of Children and Family Services, the Family to Family Collaborative serves families and children who are in—or are at risk of involvement with—the public system to help ensure the safety and well-being of children and promote family stability. The City of Cleveland Heights participates in the Collaborative along with representatives of

the Cleveland Heights-University Heights Board of Education and Library. Other members include social service organizations that can provide a safety net to families with special needs, including being at risk of homelessness.

In addition to the Cleveland/Cuyahoga County Continuum of Care and Cuyahoga County housing counseling services, the City of Cleveland Heights funds a local nonprofit, Home Repair Resource Center, to provide housing counseling services. This allows individuals and families with children who may be in imminent risk of homelessness access to counseling services which may be able to keep them in their residence.

Additionally, the Interfaith Hospitality Network of Greater Cleveland has established a temporary shelter program for homeless families. This service is designed for families and can serve a maximum of 14 individuals at a time. The maximum length of stay with the network is 60 days; however, each congregation would house the family for a maximum of seven consecutive days and then the family moves to a different congregation. Cleveland Heights has congregations that may each host a maximum of 14 individuals for seven consecutive days every two or three months.

The City of Cleveland Heights also addressed the needs of populations with special needs through a variety of CDBG funded programs including after school tutoring and the Office on Aging Social Worker program for seniors.

OTHER ACTIONS

The City of Cleveland Heights continues to work to overcome gaps in institutional structure and enhance coordination. This effort includes the participation on numerous boards and committees. Staff serves on the First Suburbs' committees addressing housing, economic development and community services to discuss common issues and approaches to addressing issues and creating opportunities. Cleveland Heights' Housing Manager has been appointed to the Cuyahoga Metropolitan Housing Authority's Landlord Advisory Council that discusses issues surrounding the Housing Choice Voucher program. Staff works with the Cleveland Heights' Family-to-Family Collaborative that works to strengthen support to families. Cleveland Heights is an active member of the Cuyahoga County HOME Consortium. Staff serves on the Executive Committee of the Greater Cleveland Reinvestment Coalition. Staff also serves on the board of the Ohio Conference of Community Development and Maximum Accessible Housing of Ohio. The City of Cleveland Heights actively seeks opportunities to enhance services and coordination. We look to all of our partner agencies as well as our

current subrecipients and the public to assist with our comprehensive planning for our programs.

Cleveland Heights continues to provide educational materials on lead-based paint to each homeowner and tenant whose property is undergoing rehabilitation. All City of Cleveland Heights departments involved in the purchase, renovation, or sale of housing have been informed of the single-family and multi-family disclosure for lead paint that took effect in Fall 1996.

The City of Cleveland Heights has been working with the Cuyahoga County Department of Development to implement a three-year lead-based paint hazard identification and reduction program that was funded by HUD. In 2021, the City of Cleveland Heights assisted 11 low- and moderate-income households with children under the age of six to remove lead paint hazards from their homes.

Cleveland Heights utilizes CDBG funds to support public services that have an impact on poverty. CDBG funds provide support to the Heights Emergency Food Center and Start Right CDC Hunger Center, which provide very low-income families a three-day supply of food once a month. 7,624 (duplicated) households were assisted in 2021.

The City's HPO and HRRC (a HUD certified counseling agency), provide counseling to low- and moderate-income homeowners. The counseling includes financial management of a household budget, which assists those persons having few financial means.

All of the City's housing programs are geared to assist persons of low- and moderate-income and elderly and disabled homeowners. We are fortunate to be a community with a wide variety of housing choices including: apartment buildings, modest single-family homes, two-family homes, medium priced to very high-end single-family homes and condominiums. Most of our housing was built prior to 1945 and therefore home repairs can be a barrier to low- and moderate-income homeowners. Housing rehabilitation costs are barriers that we are addressing to assist low- and moderate-income households remain in their homes.

LEVERAGING OF RESOURCES

Cleveland Heights has been successful in leveraging additional funds. Many of the City's rehabilitation programs require the homeowner to match the funds they receive. HRRC and FutureHeights have established good working relationships with three area banks that contribute to their ability to leverage additional funds. During the past year, housing rehab activities leveraged \$69,641.13 in private funds.

DISPLACED INDIVIDUALS

There was no displacement of individuals for any of our programs during 2021. We did not acquire or demolish any occupied real property during the year. There were rehabilitation projects completed in occupied real property but the projects did not require that the residents move from their homes.

ONE FOR ONE REPLACEMENT

There was no one-for-one replacement during 2021.

PUBLIC PARTICIPATION AND CITIZEN COMMENTS

In 1978, the City of Cleveland Heights developed a committee to provide citizen input on a timely and regular basis. Our Citizens Advisory Committee (CAC) consists of twenty-two members representing each of the twelve distinct neighborhoods of the city as well as ten at-large members, all appointed by City Council for one-year terms. The CAC holds public meetings each month to review CDBG activities. CAC holds two public hearings each August to allow subrecipients an opportunity to report on how they spent their CDBG funds and for agencies that wish to be considered for funding in the following year to present their proposals. Each September, CAC holds two public deliberation sessions regarding funding recommendations and each October a public hearing is held to review the annual plan. During its work sessions in September 2021, the CAC made recommendations on the funding of organizations for Year 47. Detailed minutes of all CAC meetings are available for further review upon request. A copy of the Citizen Participation Plan and definition for Significant Change are attached following this narrative, noted as Appendix A and B. This plan was updated during the second quarter of 2020 and adopted by City Council.

Realizing the importance of decent housing, a suitable living environment, and the need for economic opportunities for LMI residents, the City of Cleveland Heights adopted updated goals with the submission of the 2020-2024 5-Year Consolidated Plan.

City Council and the CAC believe that CDBG funds should be used in a manner that provides direct benefits to low- and moderate-income persons. This is reflected in the percent budgeted and expended on LMI activities in 2020.

A copy of this document, the Consolidated Annual Performance and Evaluation Report (CAPER), was made available for public comment from April 15, 2022 through April 30, 2022. A legal notice was placed in our local newspaper, The Sun Press, on April 14, 2022 notifying the public of the availability of the CAPER for

review and comment.

SELF EVALUATION

The City of Cleveland Heights continues to strive to achieve the goals and objectives that are outlined in our Annual and Five-Year Plans. Unfortunately, the COVID-19 Pandemic continues to have an effect on 2021 program outcomes. The Chart in Appendix C summarizes activities completed during FY 2021.

Programs have been developed to assist low- and moderate-income homeowners with health and safety concerns and minor repairs. The CDBG program funds the Violation Repair Program for Seniors, the Short Term Deferred Loan program, the Exterior Paint program, the Senior Home Stability Grant program, and the Strategic Home Repair program that assist low- and moderate-income homeowners to address needed repairs. These programs assisted 62 households in 2021, just above our stated goal of assisting 60 households.

The Single-Family Rehabilitation strategy also has a variety of programs designed to assist low- and moderate-income homeowners. The Deferred and No-Interest Loan programs administered by the City's HPO are funded through the HOME Investment Partnership Program. The HOME regulations stipulate that, at a minimum, the housing units be brought up to local housing codes. HPO also operates the Nuisance Abatement Program that addresses blighted properties within the City. The City also works with a private-nonprofit agency, HRRC. HRRC's programs utilize CDBG funds to leverage private loan dollars from banks. The Single-Family Rehabilitation strategy was projected to assist 9 households in 2021; 16 households were served. In addition, 97 emergency board-ups/special clean-ups and emergency abatement activities were performed using Nuisance Abatement funds.

The City of Cleveland Heights continues to work with the Cuyahoga County Board of Health and the Cuyahoga Department of Development to implement the Lead Safe Cuyahoga Program. The program provides grants of up to \$9,000 for the removal of lead-based paint hazards from the homes of low- and moderate-income households with children under the age of six residing in the home. In 2021, this program had a goal of assisting 10 households; the program assisted 11 households under contracts that went into effect in 2018 and 2020.

The City has a goal of assisting low- and moderate-income homebuyers. To that end, the City budgeted HOME funds to assist low- and moderate-income households purchase homes. The maximum amount of down payment assistance is \$10,000. The down payment loan is forgiven after ten years of owner

occupancy. The homebuyer must provide 3.5% of the sale price from personal funds. In 2021, 0 LMI households were assisted, short of the goal of 3. Additionally, FutureHeights began a purchase/rehab program fully renovating 1 home that will be sold to an income eligible homebuyer. Start Right CDC will be implementing a similar program in 2022. Cleveland Heights also encouraged HRRC to become a HUD Certified Housing Counseling Agency several years ago and the City continues to fund this activity with CDBG dollars.

PERFORMANCE MEASUREMENT

The Cuyahoga County HOME Consortium adopted a performance measure to track during 2015:

The number of housing units assisted that have eliminated at least one significant health and safety deficiency as a result of housing rehabilitation, as defined by local codes.

All of Cleveland Heights' housing programs tracked this performance measure. During 2021, 89 housing units assisted by the City of Cleveland Heights' housing programs eliminated at least one significant health and safety deficiency.

The CAC and City staff continue to work with local CDBG recipients to establish effective performance measurements. This information is required of all applicants seeking CDBG funds. The City of Cleveland Heights has locally adopted goals and objectives for our CDBG program. The outcome measurements attempt to demonstrate our achievement in reaching the stated goals. The CAPER narrative describes the activities conducted to address each goal and provide output information. All CDBG recipients are reporting outcomes based upon HUD's outcome reporting requirements. This information is reported on the Outcome Chart in Appendix D.

The CDBG and HOME programs significantly assist the City of Cleveland Heights to address neighborhood and community issues. These programs help the city to achieve the overall goal of ensuring the availability of decent housing and a suitable living environment for all Cleveland Heights residents, and of expanding economic opportunities for persons of low- and moderate-income. We will continue to use the funds provided to us to assist those in greatest need in Cleveland Heights. The City's rigorous systematic exterior inspection program is reporting less housing with serious housing violations. Businesses continue to be interested in and choose to locate in our commercial business districts. Developers are interested in constructing new housing on infill lots and through larger developments of assembled land. These outcomes are the results of the strong CDBG and HOME activities described in this CAPER. In summary, the City

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of Cleveland Heights continues to strive to meet and exceed our goals and objectives to assist low- and moderate-income households and to address slum and blight to maintain a viable community through the efficient management of CDBG and HOME resources.

DRAFT

APPENDIX A

Citizens Participation Plan for CDBG Activities

The City of Cleveland Heights decided upon receipt of its first block grant funding to develop a citizen participation mechanism that would do more than provide the community with limited opportunities to participate in the Community Development Block Grant (CDBG) program. The City ensured active citizen participation in the program throughout the year by forming a Citizens Advisory Committee (CAC) for the purpose of providing the community with information on the CDBG program.

This citizen participation plan is established by the City of Cleveland Heights in accordance with the Housing and Community Development Act of 1974, as amended, and 24 CFR 91.105.

The purpose of the citizen participation plan is to provide for and encourage citizen participation, with particular emphasis on participation by persons of low- and moderate-income. The plan provides for participation of residents in low- and moderate-income neighborhoods as the areas for which proposals are to be made for use of federal funds.

I. CITY COUNCIL

Cleveland Heights City Council is responsible for the final allocation of CDBG funds. CAC presents their recommendations for funding to the Council. All CAC members are invited to the meeting for their input regarding the decision-making process.

All meetings of City Council are open to the public and the public is invited to address Council prior to any action taken by Council. Meetings of City Council are published in accordance with the Charter of the City of Cleveland Heights.

II. CITIZENS ADVISORY COMMITTEE

A. Composition

The City of Cleveland Heights' Citizens Advisory Committee (CAC) is composed of persons representing each neighborhood, as well as members-at-large. The CAC consists of 22 community citizens: 10 who represent and reside within the 10 neighborhood districts and 12 who represent the community at-large. The membership may consist of fewer than 22 members. Committee members are

volunteers and are appointed by City Council for a term of not less than one year, and may serve successive terms. CAC is governed in accordance with the "Bylaws of the Citizens Advisory Committee."

CAC is charged with the responsibility of reviewing and researching Community Development needs and the Consolidated Plan of the City of Cleveland Heights. In this context, CAC analyzes the requests for funds in relation to the needs of the community and amount of funds available. CAC then makes recommendations to the Administration and City Council as to which programs should be funded and at what levels in any given year.

B. Role of CAC

Through the CAC process, the City implements a portion of its responsibility to furnish citizens with information concerning:

1. The amount of funds expected to be available;
2. The range of activities that may be undertaken with these funds;
3. The estimated amount of funds proposed to be used to benefit LMI persons;
4. The proposed activities likely to result in displacement;
5. The level of assistance available to persons if they were to be displaced.

The role of the Citizens Advisory Committee can be described in the following manner:

1. To act as an advisory committee to City Council;
2. To review and evaluate requests for CDBG funding to determine the impact of the proposed projects on the neighborhoods and city;
3. To become familiar with CDBG requirements so that CAC members can make enlightened decisions about how entitlement funds are spent;
4. To participate in monitoring the implementation of the CDBG program;
5. To assist in the evaluation of the CDBG yearly application; and
6. To fulfill HUD's requirement of citizen participation.

C. Meetings

The CAC generally meets the third Tuesday of each month at 7:30 p.m. as noted below. Meetings are held at Cleveland Heights City Hall and are open to the public. At times, it may be necessary for the CAC to hold virtual meetings

remotely. Reasonable notice of the time and place for CAC meetings and all CAC Public Hearings shall be a minimum of four days before each meeting. Reasonable notice may include publication in a local newspaper, posting at the main library, posting on the City website or social media.

1. Regular Meetings

The CAC follows a yearly schedule with each month addressing a different component of the CDBG program. The following calendar is an example of CAC's yearly schedule:

January	Public Meeting Organizational meeting and review of previous program year
February	Public Meeting Nominating committee
March	Public Meeting Election of officers
April	Public Meeting Minority Business Enterprise report review
May year	Public Hearing Review Goals & Objectives, determine needs for following
June	Public Meeting Review of applications and timetables for following year
July	No meeting
August	Two Public Hearings Grant applicants presentations
September	Two Public Meetings Grant application deliberations and recommendations
October	Public Hearing Annual Plan Draft, Minority Business Enterprise report review

November **Public Meeting**
Final annual plan review

December No meeting

At each meeting, any member of the public wishing to speak will be recognized and given five minutes to address the Committee. Extended time may be granted for public comments at the discretion of the chairperson or a majority of the members.

Minutes of the Citizens Advisory Committee are open to the public for inspection at the Cleveland Heights Department of Planning and Development at City Hall. Any person may receive the agenda or minutes of the CAC at the Department of Planning and Development.

2. Public Hearings

A total of four Public Hearings are held each year, as noted above. The first is held in May to discuss Community Development needs. The two Public Hearings held in August are an opportunity for subrecipients to report to CAC on how they spent their CDBG funds and for agencies that wish to be considered for funding in the following year to present their proposals. The final Public Hearing, held in October, is to hear citizen comments on the funding proposals received. Special advertisements are run in the local newspaper for all public hearings. They are also listed on the calendar on the City of Cleveland Heights website and government television station.

Public meetings and hearings are held in the Cleveland Heights City Hall, a handicapped accessible building, or via virtual meeting applications when needed. Notices of public hearings include information on how to contact the city if special assistance is required to attend.

III. PROGRAM PROPOSALS

All applications for CDBG funds are presented to the CAC on a standardized application form prepared by the Department of Planning and Development. The Department of Planning and Development will provide technical assistance to any group wishing to make application to the Citizens Advisory Committee.

Such technical assistance will be limited to assisting with the completion of the required application and will be available during regular working hours.

**IV. CITIZEN COMMENTS:
CONSOLIDATED AND ANNUAL PLANS
GRANTEE PERFORMANCE REPORT**

The formation of the CAC, the newspaper advertisements and the public hearings are all designed to inform and involve the wider community in the CDBG program and ensure that the funded activities meet the national objectives, as well as community needs. The Consolidated Plan, Annual Plan and Consolidated Annual Performance Evaluation Report are public documents. They are available for review and public comment for the time period designated in the regulations at City Hall in the Department of Planning and Development. Ads are placed in the local newspaper, *The Sun Press*, and a notice is placed on the City's website informing the public of their availability. Copies of the documents are also available at the Cleveland Heights-University Heights Public Library and on the City's website.

V. GRIEVANCE PROCEDURE

Submission of citizens' views, including a complaint or grievance, regarding the use of CDBG funds can be made directly to city staff at any time, verbally or in writing. Proposals for CDBG funds cannot be submitted unless there has been at least a 15-day period after publication for these comments. The City of Cleveland Heights will make every effort to respond to each written citizen comment within 15 working days, and will ensure citizens that their comments will become a part of the submission package.

VI. SUBSTANTIAL CHANGES

The current Community Development Grant regulations require the City to adopt and make public definitions for a "significant change" in the Consolidated Plan. These local definitions are reviewed and adopted by CAC each January. They are then published in the local newspaper, *The Sun Press*.

The current definitions, as adopted by the Citizens Advisory Committee, are as follows:

1. A significant change will be considered to have occurred in the Consolidated Plan if:

- a. A new activity is proposed.
- b. An activity is eliminated.
- c. An activity is increased or decreased by more than 10% of its budget or \$10,000, whichever is greater, for that year.
- d. An activity change occurs which will require displacement of persons, especially LMI persons.

VII. NEEDS OF NON-ENGLISH SPEAKING RESIDENTS

The City of Cleveland Heights will provide a translator at any public hearing or regular meeting of the Citizens Advisory Committee if the City anticipates that five (5) or more non-English speaking residents understanding the same language will attend a meeting of the CAC or if a written request by an organization representing non-English speaking residents is received five (5) working days prior to the meeting.

VIII. CITY OF CLEVELAND HEIGHTS RESIDENTIAL ANTI-DISPLACEMENT AND RELOCATION PLAN

The City of Cleveland Heights will replace all occupied and vacant occupiable low/mod income housing demolished or converted to a use other than low/mod income housing in connection with a project assisted with Federal housing and community development funds.

All replacement housing will be provided within three years of the commencement of the demolition or conversion. Before entering into a contract committing the City to provide funds for a project that will directly result in demolition or conversion, the City will make public by publication in a newspaper of general circulation, and submit to HUD, the following information in writing:

1. A description of the proposed assisted project;
2. The address, number of bedrooms, and location on a map of lower income housing that will be demolished or converted to a use other than as lower income housing as a result of an assisted project;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. To the extent known, the address, number of bedrooms and location on a map of the replacement

housing;

5. The source of funding and a time schedule for the provision of the replacement housing;
6. The basis for concluding that the replacement housing will remain low/mod income for at least ten (10) years from the date of initial occupancy;
7. Information demonstrating that any proposed replacement housing units with smaller dwelling units (e.g., a two-bedroom unit with two one-bedroom units), or any proposed replacement of efficiency or single room occupancy (SRO) units with units of a different size, is appropriate and consistent with the housing needs and priorities identified in the approved Consolidated Plan.

To the extent that the specific location of the replacement housing and other data items 4 through 7 are not available at the time of the general submission, the City will identify the general location of such housing on a map and complete the disclosure and submission requirements as soon as the specific data are available.

The Department of Planning and Development is responsible for tracking the replacement of low/mod income housing and ensuring that it is provided within the required period.

The Department of Planning and Development is responsible for ensuring that the requirements of the Uniform Relocation Act and that the requirements of Section 104(d) of the Housing and Community Development Act of 1974, as amended are followed. Consistent with this, the Department of Planning and Development will ensure that the appropriate party(ies) provide relocation payments and other relocation assistance to any low/mod income person displaced by the demolition of any housing or the conversion of lower income housing to another use.

Consistent with the goals and objectives of activities assisted under the Act, the City will take the following steps to minimize the direct and indirect displacement of persons from their homes:

- I. Rehabilitation of multi-family developments to allow tenants to remain in the building/complex during and after the rehabilitation, working on empty units first.
- II. Require rental property owners to arrange and pay for facilities to house persons who must be relocated temporarily during rehabilitation
- III. Give priority to projects that do not cause direct or indirect displacement of lower income persons.

APPENDIX B

LOCAL DEFINITIONS ADOPTED BY THE CITIZENS ADVISORY COMMITTEE

The current Community Development Grant regulations require the City to adopt and make public definitions for a "significant change" in the Consolidated Plan. These local definitions, as adopted by the Citizens Advisory Committee, are as follows:

1. A significant change will be considered to have occurred in the Consolidated Plan if:
 - a. A new activity is proposed.
 - b. An activity is eliminated.
 - c. An activity is increased or decreased by more than 10% of its budget or \$10,000, whichever is greater, for that year.
 - d. An activity change occurs which will require displacement of persons, especially LMI persons.

APPENDIX C

2021 Housing Rehab Programs Performance Review

City of Cleveland Heights Completed Housing Units	Number served by income				Number served by income				Leveraged Funds											
	% of Area Mean Income		Renter Occupied		% of Area Mean Income		Renter Occupied			HUD-CPD Funds	Other Public/Other Private									
	Owner Occupied	Section	0 - 30	31 - 50	51 - 80	215 Units	Section	0 - 30				31 - 50	51 - 80	215 Units	Served					
2021 Plan																				
Program	Projections	0 - 30	31 - 50	51 - 80	215 Units	0 - 30	31 - 50	51 - 80	215 Units	Section	Total	Served	CD8G	Home	Other Public	Other Private				
MINOR HOME REPAIRS	40	9	11	12	0	0	0	0	0	0	32	32	\$84,520.00	\$0.00	\$0.00	\$11,270.00				
HFO Violation Repair Program for Seniors	8	7	7	6	0	0	0	0	0	0	20	20	\$33,390.00	\$0.00	\$0.00	\$4,625.00				
HFO Short Term Deferred Loan	2	0	0	0	0	0	0	0	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00				
HFO Strategic Home Repair Program	25	2	4	5	0	0	0	0	0	0	11	11	\$50,630.00	\$0.00	\$0.00	\$6,645.00				
HRRC Senior Home Stability	5	0	0	1	0	0	0	0	0	0	1	1	\$500.00	\$0.00	\$0.00	\$0.00				
HOUSING REHABILITATION	9	4	7	5	0	0	0	0	0	0	16	16	\$17,675.00	\$115,782.00	\$0.00	\$35,366.58				
HRRC ASSIST Programs*	7	4	6	3	0	0	0	0	0	0	13	13	\$17,675.00	\$0.00	\$0.00	\$35,366.58				
HFO Deferred Loan	2	0	1	2	0	0	0	0	0	0	3	3	\$0.00	\$115,782.00	\$0.00	\$0.00				
EXTERIOR PAINT	20	9	11	9	0	0	0	0	0	0	30	30	\$91,045.00	\$0.00	\$0.00	\$5,100.00				
Lead Safe/Healthy Homes	10	0	5	2	0	0	0	0	0	0	11	11	\$0	\$118,905.45	\$17,904.55	\$0.00				
Homebuyer Assistance	3	0	0	0	0	0	0	0	0	0	0	0	\$0.00	\$0	\$0.00	\$0.00				
Total	82	22	34	28	0	0	0	0	0	0	89	89	\$193,240.00	\$115,782.00	\$118,905.45	\$69,641.13				
															TOTAL LEVERAGED	\$188,546.58				

* (Assist Programs are the Assist Incentive Grant, Assist 0% and Assist Deferred Loan Match) - units are counted for each program they participate in)

APPENDIX D - 2021 PERFORMANCE OUTCOMES

City of Cleveland Heights FY 2021 CAPER–CDBG Activities

Project	Objective	Outcome	Indicator	Amount
Administrative Cap				
CD Administration	N/A	N/A	N/A	\$124,787.96
CDBG Finance Administration	N/A	N/A	N/A	\$13,309.58
Fair Housing Activities	N/A	N/A	N/A	\$30,750.77
FutureHeights - Community Capacity Building	N/A	N/A	N/A	\$41,383.34
FutureHeights - Cedar Lee Mini Park	N/A	N/A	N/A	\$3,458.57
GIS	N/A	N/A	N/A	\$35,126.58
Subtotal				\$248,816.80
Public Service				
Lake Erie Ink	Suitable Living	Accessibility	400 People	\$1,296.25
Heights Emergency Food Ctr.	Suitable Living	Accessibility	6,379 People	\$27,114.67
Open Doors Academy - Middle School	Suitable Living	Accessibility	464 People	\$15,000.00
Open Doors Academy - High School	Suitable Living	Accessibility	130 People	\$11,250.00
HRRC Housing Counselor	Suitable Living	Accessibility	308 People	\$24,996.00
Family Connections - Family School Connection	Suitable Living	Accessibility	424 People	\$25,000.00
Family Connections - Parent Cafe	Suitable Living	Accessibility	14 People	\$5,000.00
Start Right Food Center	Suitable Living	Accessibility	1,245 People	\$14,000.00
Gesher	Suitable Living	Accessibility	1371 People	\$23,333.32
Office on Aging Senior Services	Suitable Living	Accessibility	338 People	\$26,929.13
WAVE Mentoring Program	Economic Opportunities	Accessibility	22 People	\$8,435.63
Subtotal				\$182,355.00
Housing				
Home Repair Resource Center				

Administration LMI	Decent Housing	Affordability	*	\$131,408.62
Assist Incentive Grant	Decent Housing	Affordability	12 Units	\$14,375.00
City of Cleveland Heights FY 2020 CAPER – CDBG Activities				
Project	Objective	Outcome	Indicator	Amount
Assist Deferred Loan Match	Decent Housing	Affordability	1 Unit	\$3,300.00
Senior Home Stability Grant	Decent Housing	Affordability	1 Unit	\$500.00
FutureHeights - FutureHomes	Decent Housing	Affordability	0 Unit	\$1,245.26
Housing Preservation Office				
Administration LMI	Decent Housing	Affordability	*	\$238,349.21
Administration S & B	Suitable Living	Sustainability	*	\$79,449.74
Exterior Paint Program	Decent Housing	Sustainability	30 Units	\$91,045.00
Violation Repair Program	Decent Housing	Sustainability	20 Units	\$33,390.00
Nuisance Abatement	Suitable Living	Sustainability	97 Units	\$31,075.00
Strategic Home Repair	Decent Housing	Sustainability	11 Units	\$50,630.00
LMI Code Enforcement	Decent Housing	Sustainability	1,231 Units	\$66,463.71
Subtotal				\$741,231.54
Public Facilities				
Street Improvement Program (ADA Curb Ramps)	Suitable Living	Sustainability	4,990 People	\$191,735.56
Shannon Road Waterline and Street Replacement Project	Suitable Living	Sustainability	665 People	\$108,039.03
FutureHeights – Noble Road Early Action Project	Suitable Living	Sustainability	6,460 People	\$9,868.12
Subtotal				\$309,642.71
Economic Development				
Administration LMI	Economic Opportunities	Sustainability	*	\$72,256.36

Administration S & B	Economic Opportunities	Sustainability	*	\$50,905.65
Storefront Rebate Program S&B	Economic Opportunities	Sustainability	12 Businesses	\$13,193.08
Storefront Loan Program S&B	Economic Opportunities	Sustainability	12 Businesses	\$45,700.80
FutureHeights – Small Business Outreach Program	Economic Opportunities	Sustainability	15 Businesses	\$2,380.47
Subtotal				\$184,436.36
City of Cleveland Heights FY 2021 CAPER – CDBG Activities				
Project	Objective	Outcome	Indicator	Amount
Total 2021 CDBG Program				\$1,666,509.41

* Personnel and related charges directly related to the provision of services. The indicators are reported under the individual activities.