

# Executive Summary

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

### 1. Introduction

The City of Cleveland became a Department of Housing and Urban Development (HUD) Entitlement Community in 2004. The 5-Year Consolidated Plan (Con Plan) was submitted in 2019 and covers the period commencing July 1, 2019 to June 30, 2024. Annual Action Plans are a requirement of HUD for jurisdictions such as Cleveland that receives Community Development Block Grant (CDBG) funds.

The Consolidated Plan has several primary sections including a Housing Needs Assessment that assesses needs for affordable housing, homelessness, special needs populations, and non-housing community development needs. The Con Plan also includes a Housing Market Analysis that evaluates existing housing stock and resources. There is a Strategic Plan that outlines objectives for the five-year planning period that sets goals between various eligible activities and projects. Other sections found in the Con Plan address the methodology for citizen participation and the institutional structure for delivering services and programs.

This document is the 5th year Action Plan and describes the actions, projects and programs that the City of Cleveland will implement to address priority needs identified in the Con Plan. The City will receive \$384,598 for the program year starting July 1, 2023 and ending June 30, 2024.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Con Plan identified eight overarching priority community development and affordable housing needs. An amendment to the Con Plan was submitted for approval to add economic development and public service.

- Affordable housing for renters and homebuyers;
- Public awareness of fair housing laws and lead-based paint requirements;
- Transitional and supportive housing needs;
- Housing and supportive services for the elderly and disabled;
- Code enforcement
- Public facility and infrastructure improvement

- Economic Development
- Public Service

From these priorities and within the context of limited funding resources, goals were developed with the following proposed CDBG allocation of \$384,598 for program year 2023-2024

- Code Enforcement - \$71,000
- Infrastructure/ Recreation /Public Facilities, Park improvements: \$192,798
- Down Payment Assistance - \$46,800
- Planning/Administration - \$74,000

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The above allocation of resources continues successful initiatives and partnerships built during previous program years. The City of Cleveland has been successful in attacking affordable housing standards and neighborhood quality issues with targeted codes enforcement and improvements to neighborhood infrastructure. Likewise, the City's affordable housing initiatives have relied on working in partnership with area non-profit providers to leverage additional housing resources and expertise. The specific projects proposed for the third year Action Plan are largely the result of the City's evaluation of how similar earlier activities have performed.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

During the Action Plan process, the City of Cleveland consulted with a wide variety of housing and service organizations, civic organizations, neighborhood residents and groups, departments of local government, elected officials, and others. The organizations and groups invited to participate covered the major providers of affordable housing, emergency housing, special needs housing, community facilities, services for youth, elderly, and disabled. Sections of government supplying public community centers, parks, recreation, and open space, public works such as sidewalk, street, water/sewer, and stormwater improvements, and with public safety officers focused on permitting and code compliance within CDBG target areas were invited to participate.

The City held 2 public hearings pertaining to the 2023-2024 Annual Action Plan. Public hearings were held January 24, 2023, and February 21, 2023.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Public Meetings received positive comments as it relates to the implementation of the CDBG Program. Most comments were made as it relates to the support of affordable housing and the completion of projects that are underway. Sidewalks were requested. Rehab/expansion was requested for the Homeless Shelter.

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

All comments were reviewed. All comments are in the Appendix section. All comment were accepted.

## **7. Summary**

Positive comments and suggestions were made in the public hearings. No comments or suggestions were rejected.

**PR-05 Lead & Responsible Agencies – 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	CLEVELAND	City Administration

**Table 1 – Responsible Agencies**

**Narrative (optional)**

**Consolidated Plan Public Contact Information**

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## **AP-10 Consultation – 91.100, 91.200(b), 91.215(I)**

### **1. Introduction**

The following table provides a list of partners, agencies, and organizations consulted during the Action Plan process.

*The table can be found in the appendix.*

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

During the Action Planning process, the City of Cleveland consulted with a wide variety of housing and service organizations, civic organizations, neighborhood residents and groups, departments of local government, elected officials, and others. The list of key consultations is included in this document. The organizations and groups consulted covered the major providers of affordable housing, emergency housing, special needs housing, community facilities, services for youth, elderly, and disabled. There were also consultations with the sections of government supplying public community centers, parks, recreation, and open space, public works such as sidewalk, street, water/sewer, and stormwater improvements, and with public safety officers focused on permitting and code compliance within CDBG target areas.

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

The City of Cleveland works closely with the Cleveland Emergency Shelter, the only emergency shelter for homeless persons within the jurisdiction. The Cleveland Shelter is part of the Continuum of Care and actively participates in the CoC planning process. Although Cleveland has not been a direct entitlement jurisdiction for the Emergency Shelter Grant (ESG) program, they have in the past participated and received funding under the State of Tennessee’s small cities program administered by the Tennessee Housing and Development Agency (THDA). The City of Cleveland provides technical assistance to the ESG program as it relates to guidance for grant application preparation and grants administration. The shelter provides more than just emergency housing, it also provides employment training in-house, life skills training, and helps reduce homelessness by helping with utilities, deposits, and correcting arrearages.

The City has utilized COVID CDBG funds to assist with Cold Weather Shelter/Warming Stations for those experiencing homelessness for 3 years. City of Cleveland and Bradley County partnered in a project to

expand the homeless shelter to serve approximately 26 more individuals. Each entity provided \$100,000 of their American Rescue Plan funding, for a total \$200,000 for the expansion.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

As described above, the City of Cleveland works most often with the Cleveland Emergency Shelter on meeting the needs homeless persons and families. Plans for a transitional shelter to better enable the homeless to move from a shelter situation to a more independent living arrangement in a unit of their own is on their agenda. There is also concern over the lack of adequate accommodations for the chronic homeless that experience recurring episodes of homelessness for longer periods of time. The City will continue to work with the Cleveland Shelter, the CoC, and other potential providers and partners involved in these initiatives.

**2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Habitat for Humanity of Cleveland
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City staff met with Habitat for Humanity's Executive Director and Finance Director and discussed projects and anticipated needs for FY 2023-2024. Habitat requested funding for down payment assistance.
2	<b>Agency/Group/Organization</b>	CITY OF CLEVELAND
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Market Analysis Anti-poverty Strategy Lead-based Paint Strategy Community Development Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City department heads and City Manager met with the Redevelopment Coordinator to discuss needs for the upcoming year. The Recreation Director, City Council members and Planning commission members also participated.
3	<b>Agency/Group/Organization</b>	Cleveland Emergency Shelter
	<b>Agency/Group/Organization Type</b>	Services-homeless

	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Homeless Needs - Chronically homeless  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth  Homelessness Strategy  Anti-poverty Strategy</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>The Director of the Shelter spoke with City Staff and voiced support for the continued partnership in providing funding and support for the homeless community. He requested assistance with rehab/expansion of the homeless shelter.</p>
4	<p><b>Agency/Group/Organization</b></p>	<p>Cleveland Housing Authority</p>
	<p><b>Agency/Group/Organization Type</b></p>	<p>PHA  Services - Housing  Service-Fair Housing</p>
	<p><b>What section of the Plan was addressed by Consultation?</b></p>	<p>Housing Need Assessment  Public Housing Needs  Homeless Needs - Families with children  Homelessness Needs - Veterans  Homelessness Needs - Unaccompanied youth</p>
	<p><b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>City Staff met with the Executive Director of the Cleveland Housing Authority and the City will continue to work closely with the housing authority in areas of fair housing and redevelopment.</p>

5	<b>Agency/Group/Organization</b>	City Fields
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Health Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Market Analysis Anti-poverty Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	City Staff met with City Fields Director and discussed current projects and needs for FY2023-2024. City Fields requested a need for funding for Down Payment Assistance and other potential affordable housing programs.

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

NA

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Chattanooga Regional Homeless Coalition	Transitional and supportive housing

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Blythe Oldfield Neighborhood Master Plan	City Fields Community Development Corporation	Affordable housing, economic stability, healthy and sustainable neighborhoods.

**Table 3 – Other local / regional / federal planning efforts**

**Narrative (optional)**

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

Two public hearings were held for the 2023-2024 Annual Action Plan. The first public hearing was held on January 24, 2023 and the second public hearing was held February 21, 2023. Both public hearings provided an overview of the CDBG program, Action Plan process, and anticipated allocation for 2023. Examples of previously funded projects and current projects were discussed. A discussion outlined the recommendations, goal and estimated funding allocations.

Comments were geared toward the continuation of down payment assistance program, and the need for sidewalks.

Public Notice was made on April 1, 2023 for a 30-day comment period ending on May 3, 2023 associated with the proposed 2023-2024 Annual Action Plan. The Plan was available for review at City of Cleveland Development and Engineering Services office.

In general, meetings are advertised in the local paper, notices were emailed, mailed, and hand delivered to an extensive list of service providers. All meeting/public hearing documentation and comments are included in Appendix. Any comments are in the minutes.

The City will utilize funds for Down Payment Assistance, sidewalk installation and rehab/expansion of the shelter.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Meeting	Minorities  Non-English Speaking - Specify other language: Spanish  Persons with disabilities  Non-targeted/broad community  Residents of Public and Assisted Housing	There were 2 public hearings with good attendance.	All comments are reflected in the minutes that are in the attachments or appendix.	All comments and suggestions were accepted.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	All comments are in the appendix	All comments are in the appendix	NA	

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

The 2023-2024 Annual Allocation is anticipated to be funded consistently with prior years funding at \$384,598. Any anticipated resources from other sources will be leveraged with the CDBG sources in the future to maximize and address the community development needs.

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	384,598	0	0	384,598	0	Admin and Planning; Down payment Assistance; Public Improvements, Infrastructure, and Recreation.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how**

**matching requirements will be satisfied**

The City of Cleveland has leveraged most of its projects since the inception of the city's CDBG program. It will continue its efforts to work with private, state, local agencies, and nonprofits to ensure that projects are completed effectively. If projects are proposed in the CDBG target area, the CDBG grant manager will work with the proposing agency to see how the project can be leveraged and if match requirements will be required for each project. Other low to moderate areas in the city will be evaluated and considered as projects are identified.

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

If publicly owned land is available for redevelopment proposals or community development assets, the grant manager will work with the entity proposing the project to ensure that the standards are consistent with CDBG rules and regulations as well as city procedures.

**Discussion**

NA

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Code Enforcement	2019	2024	Affordable Housing Non-Housing Community Development	CDBG TARGET AREA	Code Enforcement	CDBG: \$71,000	Housing Code Enforcement/Foreclosed Property Care: 400 Household Housing Unit
2	Public facility and infrastructure improvements	2019	2024	Non-Housing Community Development	CDBG TARGET AREA	Public Facility & Infrastructure Repair/Correction	CDBG: \$192,798	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2400 Persons Assisted Homeless Person Overnight Shelter: 50 Persons Assisted
3	Affordable Housing	2019	2024	Affordable Housing	CDBG TARGET AREA	Affordable housing for renters and homeowners	CDBG: \$46,800	Homeowner Housing Added: 8 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Administration	2019	2024	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	CDBG TARGET AREA	Affordable housing for renters and homeowners Public Facility & Infrastructure Repair/Correction Code Enforcement Public Awareness- Fair Housing & Lead Based Paint	CDBG: \$74,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 600 Persons Assisted Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 12 Households Assisted Direct Financial Assistance to Homebuyers: 5 Households Assisted Housing Code Enforcement/Foreclosed Property Care: 300 Household Housing Unit

Table 6 – Goals Summary

**Goal Descriptions**

1	<b>Goal Name</b>	Code Enforcement
	<b>Goal Description</b>	Provide funds for an employee and program cost associated with a codes enforcement inspector.
2	<b>Goal Name</b>	Public facility and infrastructure improvements
	<b>Goal Description</b>	
3	<b>Goal Name</b>	Affordable Housing
	<b>Goal Description</b>	Provide down payment assistance to 8 qualified first time home buyers.

<b>4</b>	<b>Goal Name</b>	Administration
	<b>Goal Description</b>	Funds will be for planning, implementing and administering the CDBG program.

# Projects

## AP-35 Projects – 91.220(d)

### Introduction

Proposed projects for FY 23-24 will focus on affordable housing for low to moderate income, infrastructure, and rehabilitation of public facilities.

### Projects

#	Project Name
1	Down Payment Assistance
2	Codes Enforcement 2023
3	Infrastructure and Public Facility Improvement
4	FY 23-24 Administration

Table 7 - Project Information

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

The projects identified for the Annual Action Plan are directly related to the goals identified through the Consolidated Planning Process.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	Down Payment Assistance
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Affordable Housing
	<b>Needs Addressed</b>	Affordable housing for renters and homeowners
	<b>Funding</b>	CDBG: \$46,800
	<b>Description</b>	This project will provide Down Payment Assistance to 8 qualified first-time homebuyers.
	<b>Target Date</b>	1/1/2026
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project will benefit 8 low to moderate income families.
	<b>Location Description</b>	This project will be in the CDBG Target Area
	<b>Planned Activities</b>	Provide Down Payment Assistance for qualified home buyers.
2	<b>Project Name</b>	Codes Enforcement 2023
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Code Enforcement
	<b>Needs Addressed</b>	Code Enforcement
	<b>Funding</b>	CDBG: \$71,000
	<b>Description</b>	Provide funds for and employee and program cost associated with a codes enforcement inspector for the enforcement of municipal codes in the CDBG Target Area.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	300
	<b>Location Description</b>	Census Tract 103 , Block Groups 1 and 2; Census Tract 105, Block Group 2; Census Tract 107, Block Groups1,2,3,4; Census Tract 102 Block Groups 1, 2 3
<b>Planned Activities</b>	Codes Enforcement Inspector will focus efforts in the CDBG Target Area and provide education to residents pertaining to codes. Inspector will participate in community outreach activities and provide assistance and guidance to residents to assist them with compliance.	

<b>3</b>	<b>Project Name</b>	Infrastructure and Public Facility Improvement
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Public facility and infrastructure improvements
	<b>Needs Addressed</b>	Public Facility & Infrastructure Repair/Correction
	<b>Funding</b>	CDBG: \$192,798
	<b>Description</b>	Sidewalk will be installed in the target area. Improvements to the Homeless Shelter will be implemented .
	<b>Target Date</b>	6/30/2025
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	This project is expected to benefit approximately 2,600 individuals in a low income area. It will also serve individuals experiencing homelessness.
	<b>Location Description</b>	This infrastructure component will be implemented in Census Tract 104. The public facility component will be implemented at the shelter located in Census Tract 108.
<b>Planned Activities</b>	Installation of sidewalk on and around Central Avenue. Upgrades to the homeless shelter.	
<b>4</b>	<b>Project Name</b>	FY 23-24 Administration
	<b>Target Area</b>	CDBG TARGET AREA
	<b>Goals Supported</b>	Administration
	<b>Needs Addressed</b>	Affordable housing for renters and homeowners Public Facility & Infrastructure Repair/Correction Code Enforcement Public Awareness-Fair Housing & Lead Based Paint
	<b>Funding</b>	CDBG: \$74,000
	<b>Description</b>	Funds will be utilized for the administration, planning, implementation and monitoring of the CDBG program.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Low to moderate income individuals and families will benefit from the CDBG program.

	<b>Location Description</b>	CDBG Target Area to include Census Tract 103 , Block group 1 and 3; Census Tract 104, Block Groups 1,2; Census Tract 105, Block group 2; Census Tract 107, Block Groups 1,2,3,4; Census Tract 108.
	<b>Planned Activities</b>	Administration and implementation of the CDBG program.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

The CDBG Target Area for the City of Cleveland covers all of Census Tracts 107, parts of Census Tracts 104 and 108 within the city limits, and parts of 103 and 105, all of which are within low to moderate income census block groups. The area is roughly bounded by Keith Street, Lee Highway, and Westland Drive to the west; 20th Street to the north; Little Chatata Creek and Appalachian Highway to the east; and Appalachian Highway to the south. Downtown Cleveland is directly west/northwest of the target area. Data in this section is taken from HUD CPD Maps, 2011-2015 5-Year ACS, 2013-2017 5-Year ACS, and the 2010 Census, depending on data available.

***Social Characteristics:*** The estimated eligible population is over 16,000. There are 6,395 total households. Householders living alone range from a high of 56% in CT 105 to a low of 21% in CT 103; elderly households account for approximately 8% to 34% within the target area block groups. At least 9%, and up to almost 30% of the households in each tract have a disabled member.

While still predominately White, over half of Cleveland's African American population resides in the target area. Over one-third of the Hispanic population resides in the target area and nearly a quarter of the Asian population resides there as well. Almost 70% of the American Indian/Alaska Native population resides within the CDBG Eligible Area. Block Group 2 of Census Tract 104 and Block Group 1 of Census Tract 108 have the largest concentrations of minority persons with 33% and 28% respectively. Although close in percentage, Block Group 2 of Census Tract 104 has over three times the minority individuals than Block Group 1 of Census Tract 108.

***Housing Characteristics:*** Within the CDBG eligible area there are 6,395 total housing units. Owner occupancy ranges from a high of 59% in Block Group 1 of CT 103 to a low of 7% in Block Group 2 of CT 105. The median value of owner-occupied housing range from \$56,600 in Block Group 1 of CT 103 to \$194,200 in Block Group 1 of CT 102. Gross rents ranges from \$458 in Block Group 3 of CT 107 to \$877 in Block Group 2 of CT 103. It is worth noting that of the tracts within the target area, Block Group 1 of CT 103 has the lowest median value of owner-occupied housing and likely the lowest gross rent for rental housing, but data was not available for this particular block group. Because in a previous section of the Consolidated Plan cost burden was identified as the most widespread housing problem by a considerable margin, cost burden with the target area was further studied. Within the target area, householders had cost burdens ranging from a high of over 46% in CT 107 to a low of 34% in CT 103. Regardless of the specific tract, at least one-quarter of all households are cost burdened.

***Economic Characteristics:*** Median household income in the four CTs range from a high of \$40,421 in CT 102 to a low of \$16,385 in CT 104. Within Census Block 1 of CT 104 over 50% of households have incomes less than \$15,000, and more than one in three have household income less than \$10,000. This compares to \$41,570 as the median household income for Cleveland as a whole. Households receiving

Supplemental Security Income (SSI), cash public assistance income, or Food Stamps/SNAP in the past 12 months range from 21% in CT 102 to 88% in CT 104. The rate of families with incomes below the poverty level ranges from a high of 51% in CT 104 to a low of 12% in CT 102; the poverty rate for families in Cleveland as a whole is 17%. Within the civilian labor force unemployment ranges from a high of over 32% in CT 104 to a low of 9% in CT 101.

**Geographic Distribution**

Target Area	Percentage of Funds
CDBG TARGET AREA	100

**Table 8 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

Collectively taken, the above referenced characteristics are the primary rationale for allocating community development investments within the CDBG target area. This is also a more densely developed detached single-family area on smaller lots, leading to the City’s strategy of improving the public spaces and facilities, particularly those spaces used for recreational purposes. The open spaces provide an opportunity for children to play and adults to exercise, and indoor space where non-profit and local government agencies can provide services to those in need, which are over represented in the low to moderate income CTs comprising the target area. An additional rationale is that the housing stock is generally older and there is a high percentage of rental properties, which when combined with lower incomes stresses owner’s ability to maintain their properties. Lastly, targeting a limited area promises a bigger impact and the focusing of leveraged resources.

If low to moderate income projects are proposed outside of the CDBG target area, each will be evaluated and reviewed to ensure eligibility and consistency with the overall goals of the 2019-2023 Consolidated Plan.

**Discussion**

In general, the CDBG target area is targeted for investment because of heightened need. That need is evidenced by concentrations of minorities and others with lower incomes, higher housing cost burdens, higher unemployment rates, higher percentages of households living on fixed incomes, and higher percentages of households with a disabled member.

# Affordable Housing

## AP-55 Affordable Housing – 91.220(g)

### Introduction

The City of Cleveland’s CDBG program supports affordable housing opportunities. With few exceptions, the CDBG regulations do not allow funds to be used for the construction of housing. However, what is permitted and what had been an effective strategy for the City’s CDBG investments is supporting other partner agencies such as Habitat for Humanity and City Fields that do new construction, either through allowable activities such as land acquisition, infrastructure, and site development, and by providing financial assistance for low to moderate income homebuyers. These activities will be strategically pursued throughout the Annual Action Plan and Consolidated Plan planning periods.

The City actively supports area public and private housing and social service agencies that provide assistance to residents. Cleveland and Bradley County are fortunate to have many agencies which are instrumental in meeting the various needs of lower income residents. The City works directly with Habitat for Humanity, an affordable housing provider; and City Fields, a Community Development Corporation serving the CDBG target area; the Cleveland Housing Authority and Cleveland Emergency Shelter on the public housing and homeless fronts. The City of Cleveland provides code enforcement measures, foreclosed property care, & public awareness of Fair Housing to households. Financial and educational assistance is also provided by the City through its various social partners.

The City plans to continue the partnership with City Fields to complete portions of the master plan. In 2018, they became a 501c3 designated Community Development Corporation (CDC) to help the City more aggressively address affordable housing by developing quality affordable housing and social and economic development issues that exist in certain parts of Cleveland. To achieve this goal, City Fields has partnered with the CDBG office to assist with down payment assistance. As a CDC, City Fields can develop affordable housing to grow homeownership in their target area. Purchasing homes in order to renovate and sell them to future homeowners can also aid in preventing rapid gentrification. Additionally, this designation allows them to work with local banks, offering financial services that will benefit the neighborhood.

One Year Goals for the Number of Households to be Supported	
Homeless	30
Non-Homeless	8
Special-Needs	0
Total	38

**Table 9 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0

<b>One Year Goals for the Number of Households Supported Through</b>	
The Production of New Units	0
Rehab of Existing Units	0
Acquisition of Existing Units	0
Total	0

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

**Discussion**

City of Cleveland will continue the partnerships with City Fields and Habitat for Humanity in the efforts of affordable housing.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Cleveland Housing Authority has been serving Cleveland and Bradley County since 1959 through the provision of affordable housing rental assistance programs to income eligible citizens. CHA currently operates a Project Based Rental Assistance (PBRA) program of 293 units, and a Public Housing (PIH) program of 114 units. All CHA properties are disbursed over fourteen (14) scattered sites in southeast Cleveland. Additionally, CHA also operates a Housing Choice Voucher (HCV) program serving up to 208 families and a Veterans Affairs Supportive Housing (VASH) program serving up to 15 veteran families.

As of April 1, 2023 a total of 133 families resided in PBRA program units and 104 families resided in PIH program units. Note: Many of the PBRA program units are undergoing substantial rehab and are unable to be occupied as of the date of this report. 167 families were being served in the Housing Choice Voucher program and 11 veteran families are served in the VASH program. CHA administers approximately \$3.2 million dollars of combined rental assistance to the Cleveland and Bradley County community. Currently, CHA is in the midst of a major renovation project within the PBRA program. As a result, the Housing Authority suspended much of its PBRA leasing activity due to renovation activity. As a result, the Public Housing waiting list is closed. Currently, the PIH waiting list contains 319 applicants among all bedroom sizes (1, 2, 3, 4, and 5). The Housing Choice Voucher waiting list contains 54 applicants and remains closed as of the date of this report. The average income of residents in all programs remains at or below 30% of AMI. CHA financial support is derived from HUD in the form of PIH Operating Subsidy, PBRA Housing Assistance Payments, and Section 8 Housing Assistance funding.

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

CHA is pursuing a conversion of its Public Housing Program to HUD's Multi-Family Program through HUD's Rental Assistance Demonstration (RAD). CHA closed on the first phase of its conversion on August 30, 2022 and a Notice to Proceed was issued to commence rehabilitation activity on vacant PBRA units. The rehabilitation project is estimated for completion in September 2024. The conversion presents an opportunity for CHA to solidify its financial base using the Section 8 funding stream and exit the Public Housing Operating Subsidy funding system. The conversion also presents an opportunity for CHA to become the owner of the portfolio and thus utilize available financing methods to leverage additional capital for modernization and/or new construction of its affordable housing stock.

CHA intends to complete the conversion of the remaining 114 PIH units in multiple phases and will utilize a variety of methods available thru RAD. Specifically, CHA will execute a gut-rehab modernization of three hundred six (306) units of the four hundred twenty (420) units. Additional phases may include the disposition (sale) of select properties to CHA's non-profit instrumentality, Tanasi Housing Development Corporation to enhance the affordability of those units. Tanasi will function as CHA's development arm for all future affordable housing production as well as other development

opportunities. Lastly, CHA may utilize HUD's Streamlined Voluntary Conversion (SVC) for any remaining Public Housing Program units to complete the conversion. The conversion will position CHA's affordable housing portfolio for financial sustainability through HUD's Multi-Family program. All conversion activities/methodologies will result in units remaining affordable and continue to serve existing and future program participants with affordable housing for low-income clients.

CHA is positioned as a Redevelopment Authority for the City of Cleveland and can work in collaboration.

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

The Cleveland Housing Authority Board is comprised of seven members, including one resident. Appointments to the board are made by the Mayor of Cleveland. The Cleveland Housing Authority strongly encourages the involvement of its residents in providing input into its management policies and operating procedures. CHA's Resident Association holds periodic meetings to provide a forum for input, coordination between resident and CHA staff regarding /policy changes as well as current and future modernization activities.

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

NA

**Discussion**

City of Cleveland is partnering with Cleveland Housing Authority for future activities. Those activities are currently in the pre-planning stage.

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

### **Introduction**

Cleveland has one primary facility for housing homeless persons. This is the Cleveland Emergency Shelter operated by the Bradley/Cleveland Community Services Agency. The Cleveland shelter has 50 beds and provides emergency shelter housing for males, females, and couples. The Executive Director reports that they can usually house anyone who needs housing, meaning they seldom turn anyone away who be unsheltered. The shelter receives ESG funding from the State of Tennessee and uses those funds for essential services and homeless prevention (utility deposits, some arrearages, etc.). In addition to the Cleveland Emergency Shelter there is also a Harbor Safe House that can accommodate between 10 to 12 families who are victims of domestic violence. Life Bridges also provides services for mentally handicapped individuals to become more self-sufficient; to train them to perform everyday tasks and helps them to gain employment in the community. There is no transitional housing or permanent supportive housing in Cleveland, although the agencies mentioned provide wrap around type services, including life training, employment training, and other programming.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The Homeless Needs Assessment in this Consolidated Plan is primarily based on point-in-time information provided to HUD by the Chattanooga/Southeast Tennessee Continuum of Care (CoC). These counts are done at least every other year and will continue throughout the consolidated planning period. CoC's are required to provide an unduplicated count of homeless persons according to HUD standards. Where appropriate, anecdotal information and/or estimates by service providers are included in the Consolidated Plan narrative to support the need and extent of homelessness. Although homelessness is very visible in most U.S. communities, including Cleveland, TN, by its very nature it is extra difficult, particularly for smaller jurisdictions with fewer resources, to accurately document and quantify.

Outreach to homeless individuals is primarily done through case managers and staff at area shelters and health care facilities. These agencies are the key service providers for homeless needs and manage their programs to keep services in line with their assessment of needs and discussions with clients.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

The City of Cleveland has in the past received funding through the State of Tennessee Small Cities Emergency Shelter Grant program. These funds are sub-granted to the Cleveland Emergency Shelter for essential services and homelessness prevention. At this time there are no transitional housing options

available within the City, however, this is routinely identified as a need and continues to be discussed.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

The City of Cleveland and the providers of services and emergency housing for the homeless are more focused on meeting immediate shelter needs. The need to end the cycle of homelessness is recognized, but limited resources and capacity, and the relatively small number of persons experiencing homelessness, restrict what can be accomplished and result in a focus more purely on daily health and safety issues. The Cleveland Emergency Shelter has a total of 50 beds and is actively pursuing funding for transitional shelter needs.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The City of Cleveland receives funding through the State of Tennessee Small Cities Emergency Shelter Grant program. These funds are sub-granted to the Cleveland Emergency Shelter for essential services and homelessness prevention. Homeless prevention funds go for security and utility deposits, and in some cases for arrearages.

## **Discussion**

Bradley County and the City of Cleveland granted \$100,000 each for the expansion of the shelter. Total project cost is estimated at \$200,000. City of Cleveland will also utilize some of the FY 23 CDBG funding for needed rehab and renovation to the shelter.

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

### **Introduction:**

Educating and training the public of the importance of affordable housing opportunities throughout the city will be a priority. Professionals in the real estate community understand the needs of the community and may need to convene regularly to discuss how to make sure there are a range of housing types and incomes throughout all parts of the city may be an option.

Funding opportunities used by nonprofit developers could be matched or leveraged with other public-private partnerships made available to the city. The need to work with regional agencies and partners to create balance within the region may also be appropriate to create a viable and sustaining community for all.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City continues to make improvements to the Zoning Ordinance to promote affordable housing and has amended the Zoning Ordinance on Accessory Dwelling Units to include “detached accessory dwelling” which provides a secondary dwelling within an existing single-family home. Recent demographic data reveals that multi-generational habitation has now reached 17% and is expected to increase with the graying of the general population as more individuals look to be in the care of close relatives. Other benefits of allowing detached accessory dwellings include the on-site presence of landlords which creates accountability for those living in the accessory units.

### **Discussion:**

#### **Fair Housing Narrative:**

An Analysis of Impediments to Fair Housing Choice (AI) was prepared in 2019 and outlined the following impediments:

- Lack of public awareness of fair housing laws
- Southside of Cleveland is currently concentrated with low-income households and affordable housing development
- Lack of landlord/tenant coordination and information

The City will continue and expand efforts to:

- To educate and disseminate information regarding fair housing laws and complaint procedures

by working with public and private sector partners

- Improving the city's website
- Work with non-profit and for-profit developers to discuss and strategy for creating housing opportunities across the city
- Maintain resources for translation services to disseminate information
- Provide assistance for neighborhood groups trying to form
- Provide fair housing information to landlords and tenants
- Provide down payment and closing cost assistance in conjunction with City Field's and Habitat

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

#### **Actions planned to address obstacles to meeting underserved needs**

- Code enforcement in LMI (CDBG Target) area
- Affordable housing efforts with local nonprofit developers, as well as down payment assistance availability
- Infrastructure, public facility and recreation improvements in the CDBG Target area
- Continued leveraging and partnerships with other city departments, area nonprofits, and interested organizations

#### **Actions planned to foster and maintain affordable housing**

- Affordable housing opportunities made available through local nonprofit developers such as the Habitat for Humanity of Cleveland and City Fields
- Code enforcement to increase livability in the LMI (CDBG Target) area

#### **Actions planned to reduce lead-based paint hazards**

- Code enforcement efforts in the CDBG Target area
- Training and public awareness of lead-based paint hazards

#### **Actions planned to reduce the number of poverty-level families**

- Continued leveraging of resources in the CDBG target area which has a high concentration of poverty-level families
- Regional efforts to respond to the increase of jobs in the region

#### **Actions planned to develop institutional structure**

The gaps in the structure and service delivery system will include collaboration with the Chamber of Commerce, Cleveland State Community College, and Lee University students, administrators, and faculty. Funding opportunities can be available through collaborative efforts between the city and many of its partners and regional outreach.

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

The City will continue to partner with area public and private housing and social service agencies to help

create livable communities for all the citizens of Cleveland. To increase leveraging and partnerships, the city may need to work with regional agencies for additional leveraging and innovative ideas for future development options.

**Discussion:**

The City and the County are working together to provide funding for non-profits that serve low income individuals . Both City of Cleveland and Bradley County are providing funding to City Fields, Habitat for Humanity, Caring Place and Bradley Cleveland Community Services Agency.

## Program Specific Requirements

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

#### Introduction:

A CDBG Target area has been defined in the City of Cleveland and all CDBG funds are expected to be available for low to moderate income households within this area. Projects may be proposed outside of the CDBG Target area and each will be evaluated on its eligibility and consistency with the Consolidated Plan.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>0</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

Cleveland will utilize 100 percent of CDBG funds to benefit low to moderate income areas and individuals.

## Attachments

Citizen Participation Comments

4/1/23

10900 Legals

**LEGAL PUBLICATION  
CITY OF CLEVELAND  
COMMUNITY  
DEVELOPMENT BLOCK  
GRANT PROGRAM  
2023 ANNUAL ACTION PLAN  
NOTICE OF 30-DAY  
COMMENT PERIOD**

The 2023-24 Annual Action Plan for the City of Cleveland's Community Development Block Grant (CDBG) is available for public review at the City's Development and Engineering Services Office located at 185 Second Street NW, Cleveland, TN. This public notice initiates a 30-day comment period which will conclude on May 2, 2023. Written or oral comments may also be submitted to Cathy Andrews, Redevelopment Coordinator, City of Cleveland, P. O. Box 1519, Cleveland, TN 37384-1519 or via email: [car-drews@clevelandtn.gov](mailto:car-drews@clevelandtn.gov)  
April 1, 2023

*the*

## Public Hearing 1


  
 OFFICE OF COMMUNITY DEVELOPMENT  
 LEGAL PUBLICATION  
 NOTICE OF PUBLIC  
 HEARING  
 COMMUNITY DEVELOPMENT  
 BLOCK GRANT  
 ACTION PLAN 2022-2023  
 The City of Cleveland will hold  
 a public hearing on Tuesday,  
 January 24, 2023, at 1:00 p.m.  
 at the Blitha Family Support  
 Center Conference Room (co-  
 located at 1075 Blitha Avenue  
 SE, Cleveland, OH) to hear pub-  
 lic comment regarding the de-  
 velopment of the Community  
 Development Block Grant (CD-  
 501 Avenue Action Plan for the  
 2022-2023 year.  
 The primary purpose of this  
 public hearing is to solicit and  
 receive input from citizens, non-  
 profit organizations and other  
 interested parties regarding  
 community development and  
 housing needs for the planning  
 period of 2022-2023.  
 All Cleveland residents are in-  
 vited to attend and participate  
 in the public hearing. It is expected  
 that accommodations are needed  
 for non-English speaking or  
 hearing visually impaired indi-  
 viduals. Call 216-422-4730  
 for more information or to  
 request accommodations. The  
 public hearing will be held on  
 Tuesday, January 24, 2023,  
 at 1:00 p.m. at the Blitha  
 Family Support Center, 1075  
 Blitha Avenue, SE, Cleveland,  
 OH 44115.

# CDBG PUBLIC HEARING

01/24/2023

Signature	Company/Organization
Cathy Andrews	City of Cleveland
Mitchell Cominsoli	City of Cleve.
David Goodwill	City Fields
Corinne Freeman	The Caring Place
Tamara W	City of Cleveland
Eva Vanhook	Family Promise
Demetrius Ramsey	Bradley Cleveland CSA
Demetrius Ramsey	Cleveland Bradley Housing
Dustin Tommeny	City Fields
Mitchell Goldston	" "
David Goodwill	
Diivya Baines	United Way
Nia Lawson	Health Dept.
Alemit Dotsa	HBCHNA
Shauna Slamp	UWOR
Najee Massingill	Habitat for Humanity of Cleveland
Jameson Weston	Bradley Prevention Coalition
Ryan Truesdale	"
Dillon Kirkpatrick Tiffany Kirkpatrick	Family Promise

**CDBG PUBLIC HEARING MINUTES  
JANUARY 24, 2023, AT 5:30 PM  
FAMILY SUPPORT CENTER CONFERENCE ROOM  
1075 BLYTHE AVE. SE  
CLEVELAND, TN 37311**

The City of Cleveland held a public hearing on January 24, 2023 to request comments and input from the public as it relates to the 2023-2024 Annual Action Plan. Cathy Andrews, Redevelopment Coordinator for the city, called the public hearing to order. Ms. Andrews explained the CDBG program, national objectives, and gave examples of past projects.

Dustin Tomney of City Fields requested that funds be used for Down Payment Assistance and efforts toward affordable housing. NaCole Harris of Habitat for Humanity also requested that funds be used for Down Payment Assistance and efforts toward affordable housing. Alma Dotson requested that future CDBG funds be put toward economic development projects and sidewalk projects. Corinne Freeman of the Caring Place requested that there be continued support and investment in the College Hill area.

Positive comments relating to the CDBG program were given and gratitude expressed for the financial assistance and technical assistance provided by the CDBG program and the Redevelopment Coordinator.

Respectfully submitted,

Cathy Andrews  
Redevelopment Coordinator

**Public Hearing 2**

1123023

10900 Legals

**LEGAL PUBLICATION  
NOTICE OF  
PUBLIC HEARING  
COMMUNITY  
DEVELOPMENT BLOCK  
GRANT**

**ACTION PLAN 2022-2023**

The City of Cleveland will hold a public hearing on Tuesday, February 21, 2023, at 6:00 p.m. at the City Municipal Building's Conference Room located at 190 Church St NE, Cleveland, TN to hear public comment regarding the development of the Community Development Block Grant (CDBG) Annual Action Plan for fiscal year 2023-2024. The primary purpose of this public hearing is to solicit and receive input from citizens, non-profit organizations and other interested parties regarding community development and housing needs for the planning period of 2023-2024. All Cleveland residents are invited to attend and participate in the public hearing. If special accommodations are required for non-English speaking or hearing/visually impaired, notify Cathy Andrews at 423-478-1913 or via email at c-andrews@clevelandtn.gov prior to the day of the meeting. The public hearing initiates a 30-day comment period, which will conclude on March 24, 2023, at 4:00 p.m. Citizens are also encouraged to submit written or oral comments to Cathy Andrews, Redevelopment Coordinator, City of Cleveland, 185 Second Street NE, Cleveland, TN 37311. January 29, 2023



**EQUAL HOUSING  
OPPORTUNITY**

**CDBG PUBLIC HEARING MINUTES  
FEBRUARY 21, 2023, AT 6:00 PM  
CITY OF CLEVELAND MUNICIPAL BUILDING  
190 CHURCH STREET NE  
CLEVELAND, TN 37311**

The City of Cleveland held a public hearing on February 21, 2023 to request comments and input from the planning commission and the public as it relates to the 2023-2024 Annual Action Plan. Chairperson Pennington called the public hearing to order and introduced Cathy Andrews, Redevelopment Coordinator for the City of Cleveland. Ms. Andrews explained the CDBG program, national objectives, and gave examples of past projects.

Chairperson Pennington acknowledged the benefits of previous sidewalk projects funded by CDBG and requested that funds be used for a section of sidewalks along 20<sup>th</sup> Street to the Downtown area. Alma Dotson also requested more funds be put toward sidewalk projects. Bill Estes stated that he was very pleased with the Down Payment Assistance program and wants to see it continue. He also discussed utilizing a piece of land near Sheppard Field for a potential green space in the future.

With no further comments, Chairperson Pennington closed the hearing.

Respectfully submitted,

Cathy Andrews  
Redevelopment Coordinator

**City of Cleveland**  
**Municipal Planning Commission**  
**Regular Meeting**  
**Tuesday, February 21, 2023 6:00 P.M.**  
**Please Sign Legibly!**

<u>Name</u>	<u>Company/Address</u>	<u>Email</u>
Taylor Koch	City	tkoch@cleinciviltr.gov
LEE DUNLAP	MESINA INVESTMENTS	powell mesinae/eed66@yahoo.com
Deek Blackwood	MAP Engineers	mapengr@epbt.com
Dustin Housley	DHS Custom Homes	DustinDSCustomHomes@gmail
Susie Gilbert	Contract Real Estate	susiegilbert@bellsextort

RESOLUTION 2023-40

RESOLUTION FOR APPROVAL OF THE  
2023-2024 ANNUAL ACTION PLAN FOR THE  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

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WHEREAS, the City of Cleveland, Tennessee will be receiving a CDBG annual allocation of an estimated amount of \$384,598 for FY 2023-2024; and

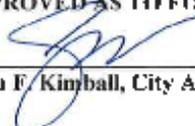
WHEREAS, public hearings were held on January 24, 2023, and February 21, 2023, to hear comments and input from the public. A draft was available on April 1, 2023, which began a thirty-day comment period ending on May 2, 2023. A copy of the Plan was made available at the Development and Engineering Services Office as advertised in the *Cleveland Daily Banner* on April 1, 2023;

WHEREAS, comments made during public hearings regarding the Action Plan were received and reviewed by City staff;

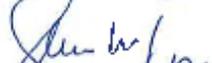
NOW, THEREFORE, BE IT RESOLVED, the *2023-2024 Action Plan* be approved by the City Council, and be it further resolved that City staff authorized to submit the plan to the United States Department of Housing and Urban Development (HUD), and be it resolved that the Mayor is authorized to sign all grant agreements, contracts and certifications with HUD that are required to carry out the CDBG program described in the Action Plan.

Approved this 8<sup>th</sup> day of May 2023.

APPROVED AS TO FORM:

  
\_\_\_\_\_  
John F. Kimball, City Attorney

  
\_\_\_\_\_  
Kevin Brooks, Mayor

  
\_\_\_\_\_  
Shawn McKay, City Clerk

**List of Partners and Agencies**



Grantee SF-424's and Certification(s)

OMB Number: 4610-0004  
Expiration Date: 11/30/2025

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changes/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* 3. Key word - select appropriate letter(s): <input type="text"/> * Other (specify): <input type="text"/>
* 5. Date Received: <input type="text"/>	* 4. Applicant Identifier: <input type="text"/>	
3a. Federal Entity Identifier: <input type="text"/>	5a. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>B. APPLICANT INFORMATION:</b>		
* 2. Legal Name: <input type="text"/>		
* b. Employer/Teacher/Service Number (EIN/TIN): <input type="text"/>	* c. UEI: <input type="text"/>	
d. Address:		
* Street 1: <input type="text"/>	<input type="text"/>	
* Street 2: <input type="text"/>	<input type="text"/>	
* City: <input type="text"/>	<input type="text"/>	
* County/Parish: <input type="text"/>	<input type="text"/>	
* State: <input type="text"/>	<input type="text"/>	
* Province: <input type="text"/>	<input type="text"/>	
* Country: <input type="text"/>	<input type="text"/>	
* Zip - Postal Code: <input type="text"/>	<input type="text"/>	
a. Organizational Unit:		
Department Name: <input type="text"/>	Division Name: <input type="text"/>	
E. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text"/>	* First Name: <input type="text"/>	
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: <input type="text"/>	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: <input type="text"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text"/>	Fax Number: <input type="text"/>	
* E-mail: <input type="text"/>		

Application for Federal Assistance SF-424	
<b>* 9. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City of Cleveland Development..."/> <b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/> <b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/> <b>* Other category:</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="US Department of Housing and Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.018"/> <b>CFDA title:</b> <input type="text" value="Community Development Block Grant"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="BHC - Transit"/> <b>* Title:</b> <input type="text" value="CDBG Title Element: Federal Transit"/>	
<b>13. Competition Identification Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 16. Descriptive Title of Applicant's Project:</b> <input type="text" value="City of Cleveland's Community Development Block Grant"/>	
Attach supporting documents as specified in agency req. users. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional District Of:	
* a. Applicant: <input type="text"/>	* b. Program/Project: <input type="text"/>
Attach an additional list of Program-Project Congressional Districts if needed.	
<input type="text"/>	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2023"/>	* b. End Date: <input type="text" value="06/30/2024"/>
18. Estimated Funding (\$):	
* a. Federal: <input type="text" value="490,000.00"/>	
* b. Applicant: <input type="text"/>	
* c. State: <input type="text"/>	
* d. Local: <input type="text"/>	
* e. Other: <input type="text"/>	
* f. Program Income: <input type="text"/>	
* g. TOTAL: <input type="text" value="490,000.00"/>	
* 19. Is Applicant Subject to Review By State Under Executive Order 12872 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12872 Process for review on <input type="text"/> . <input type="checkbox"/> b. Program is subject to E.O. 12872 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12872	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach: <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurance*** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001) <input checked="" type="checkbox"/> ** AGREE <small>* The list of certifications and assurance, or an Internet site where you may obtain this list, is contained in the attachment and is agency specific form only.</small>	
Authorized Representative:	
First Name: <input type="text"/>	* First Name: <input type="text" value="Kevin"/>
Middle Name: <input type="text"/>	
* Last Name: <input type="text" value="Brock"/>	
Title: <input type="text"/>	
* Title: <input type="text" value="Mayor"/>	
* Telephone Number: <input type="text" value="423-472-4551"/>	* Fax Number: <input type="text"/>
* Email: <input type="text" value="kevin@seviercountynv.gov"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="5/17/23"/>

**ASSURANCES - NON-CONSTRUCTION PROGRAMS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

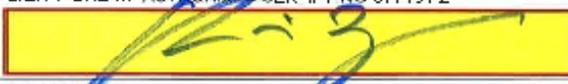
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial, and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4724-4731) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-367) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1811-1883, and 1820-1890), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794) which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-615), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§203 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290c-3 and 290c-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§861 et seq.), as amended, relating to non-discrimination in the sale, rental or financing of housing; (i) any other non-discrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other non-discrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles I and II of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or Federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7321-7322) which limit the political activities of an employee whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) inclusion of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of wetland facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11995; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (2 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 105 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 90-345 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from: (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect; (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION City of Cleveland	DATE SUBMITTED 5/16/2023

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**CERTIFICATIONS**

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-FLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701n) and implementing regulations at 24 CFR Part 75.

  
Signature of Authorized Official

5/16/2023  
Date

Mayor  
Title

### Specific Community Development Block Grant Certifications

The Enticement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 370.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. **Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 7/1/23 - 6/30/24 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations, and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** -- It will comply with applicable laws.

Signature of Authorized Official  Date 5/14/2023

Title MANA