

CITY OF CLEVELAND HEIGHTS
COMMUNITY DEVELOPMENT BLOCK GRANT
CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION
REPORT

GRANT NUMBER B-19-MC-39-0005

PERIOD COVERED: JANUARY 1, 2019 TO DECEMBER 31, 2019

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 2017, 2018, and 2019 shall be a minimum of 70% of our expenditure. In 2019, \$1,181,253.74 or 79% of our expenditures were on activities benefiting low-and moderate-income (LMI) persons. For the 3-year LMI certification of 2017-2019, the City of Cleveland Heights expended \$3,324,488.49 or 86% of its CDBG funds on activities that benefit LMI households.

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 eliminated slum and blighted conditions. Slum and blighted conditions within the City have been identified through the Investment Target Area (ITA) study 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 and Objectives.

GOAL I: ENSURE THE AVAILABILITY AND SUSTAINABILITY OF DECENT HOUSING AND A SUITABLE LIVING ENVIRONMENT FOR ALL CLEVELAND HEIGHTS RESIDENTS.

Objective A: Preserve and maintain the housing stock and create housing opportunities especially for low- and moderate-income persons.

Objective B: Encourage the integration of population groups within the community and promote an increase in the diversity and vitality of neighborhoods.

Objective C: Maximize the independence of targeted population groups by providing services which expand choices.

Objective D: Maintain safe, functional, and healthy neighborhoods by providing services which improve the physical environment, especially in low- and moderate-income areas.

Objective E: Provide support services to youth, identifiable low- and moderate-income persons and special population groups in the community.

GOAL II: EXPAND ECONOMIC OPPORTUNITIES FOR PERSONS OF LOW- AND MODERATE-INCOME.

Objective A: Alleviate physical and economic distress and create viable commercial areas through the prevention of the deterioration of commercial districts.

Objective B: Stimulate private investment to create and retain employment opportunities, especially for low- and moderate-income persons.

These goals and objectives are met through both city programs and with the assistance of a number of subrecipients. Subrecipients in 2019 were: Heights Emergency Food Center, Start Right Community Development Corporation, Open Doors Academy, Heights Youth Club, Family Connections, Geshel, Lake Erie Ink, FutureHeights, Home Repair Resource Center, the Cedar Taylor Development Association, the Bhutanese Community of Greater Cleveland, and Central Bible Baptist Church. 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 & OBJECTIVES

GOAL I: ENSURE THE AVAILABILITY OF DECENT HOUSING AND A SUITABLE LIVING ENVIRONMENT FOR ALL CLEVELAND HEIGHTS RESIDENTS.

Objective A: Preserve and maintain the housing stock and create housing opportunities especially for low- and moderate-income persons.

The preservation of housing and the provision of housing opportunities for low- and moderate- income persons is the primary goal for the use of CDBG funds in Cleveland Heights. This report and the IDIS reports provide detailed data indicating that \$715,488.25 or 40% of the CDBG expenditures for Year 45 were spent on housing programs. The following programs meet Goal I, Objective A.

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

Short-Term Deferred Loan (HUD #1238) 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. 1 loan was disbursed in 2019 for \$3,220.00. The activity received \$ \$2,675.02 in program income.

Exterior Paint Program (HUD #1237) 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 2019, the program assisted 29 housing units. It expended \$82,045.00.

Violation Repair Program for Seniors (HUD #1239) 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 2019, this program assisted 23 LMI households with minor repairs and expended \$ 34,187.75.

Strategic Home Repair Program (HUD #1241) 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 2019, 11 LMI households were assisted expending \$47,456.00.

Nuisance Abatement Program (HUD #1243) This program allows the City to address exterior code violations at problem properties. The program allows the City to remediate health and safety issues at properties, including the boarding up of doors, windows, etc. on homes where break-ins have occurred, 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 128 emergency nuisance board ups/clean ups in 2019. \$47,206.37 was earned in program income and the program expended \$37,214.78 during 2019.

HPO Program Delivery Costs (HUD #1235 & #1236) The Housing Preservation Office (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 #1238), Exterior Paint Program (HUD #1237) and Violation Repair Program for Seniors (HUD #1239). HPO also administers the HOME Investment Partnership Act Deferred and No Interest Loan Rehabilitation Programs and Down Payment Assistance Program and a HUD funded Lead Safe Cuyahoga Program that benefits low- and moderate-income households.

HPO administers the CDBG funded Nuisance Abatement Program (HUD #1243). 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 2019, HPO expended \$312,686.63 in operating costs, which included staff salaries and other program delivery expenses. Of this amount \$234,514.97 is LMI (HUD #1236) and \$78,171.66 is for slum and blight activities (HUD #1235).

LMI Code Enforcement (HUD #1242) This program uses CDBG funds to pay for staff salaries and administrative expenses for a full time Housing Inspector who conducts systematic inspections for health and safety violations in LMI census block groups of the City. In 2019, \$53,424.11 was expended for this activity. 518 inspections were conducted in 2019

producing 3,040 violations. 1,972 violations were corrected as of December 31, 2019.

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 2019, Cleveland Heights' HOME program generated \$129,221.53 in program income, these funds will be budgeted and used to expand the HOME program in 2020.

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 2019, two single family homes were under rehabilitation and one home was submitted for final reimbursement to the Cuyahoga County Department of Development. These HOME expenditures totaled \$52,520.

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 2019.

Note: The Deferred Loan and No Interest Loan Programs were funded by CDBG prior to 1998. Funds repaid from these loans were budgeted to the Commercial Loan Program during the year. Please refer to the financial report under program income for exact amounts.

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 Department of Housing and Urban Development 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 an agreement with the Cuyahoga County Board of Health for Lead Hazard Control and Healthy Homes Grant for the period September 4, 2018 to September 3, 2021. In 2019, HPO completed 2 draw requests and reported lead remediation for 20 housing units in the amount of \$166,221.25 in Lead Hazard Control Grant funds and \$42,425.00 in Healthy Homes funds while leveraging \$42,023.75 of private funds and \$8,335.00 in other grant funds.

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

ASSIST Grants (HUD #1230) The Assist Grants are HRRC programs that provide a grant to LMI homeowners to assist with rehabilitation activities. Assist Grants are composed of two activities: the Assist 0% Program and the Assist Incentive Grant. A total of 7 households were assisted.

ASSIST 0% (HUD #1230) Funds are used to guarantee bank loans and to reduce the principal of bank loans so that the applicant pays an effective rate of 0% interest on a loan. No funds were disbursed for this activity in 2019.

ASSIST Incentive Grants (HUD #1230) This program offers a grant of \$500 to \$1500 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 2019, \$8,000.00 was expended. 7 single-family houses were assisted; 1 of these households also participated in the Deferred Loan Match Program and another participated in the Senior Home Stability Grant Program.

Senior Home Stability Grant (HUD #1232) 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, flat or low-slope roof replacement and more. A total of \$9,240.00 was spent to assist 6 households during 2019.

Major Systems Deferred Loan Match Program (HUD #1231) 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 2 LMI households in 2019.

The program expended \$3,955.00 in 2019 and received \$0 in program income.

Housing Counselor (HUD # 1229) This program counsels residents on financial literacy, first-time homebuyer issues, budgeting for home repair projects and other appropriate topics. This program expended \$22,613.28 in 2019 and assisted 260 people of which 62% were LMI. This activity is classified as a public service and qualifies by serving LMI clientele.

Home Repair Resource Center (HRRC) Program Delivery Costs (HUD #1228) CDBG funds are provided to HRRC to maintain housing rehabilitation program operations and services including Assist 0% and Assist Incentive Grant (HUD #1230), Senior Home Stability Grant (HUD #1232) and Major Systems Deferred Loan Match (HUD #1231). During 2019, HRRC continued coordination efforts with the City's Housing Preservation Office by assisting with client intakes for HPO rehabilitation programs. In 2019, HRRC expended \$101,445.70 for their LMI administrative costs that included staff salaries and administrative expenses.

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

The City of Cleveland Heights utilized HOME funds to assist low-and moderate-income households purchase homes. Home Repair Resource Center 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 2019, four LMI households were assisted utilizing a total of \$44,000 of HOME funds and leveraging \$33,194 in private down payment funds and \$367,012 in private mortgage funds.

Cumulatively, \$715,488.25 or 40% of CDBG funds was expended on housing programs in 2019.

Low- and moderate-income housing programs expended \$600,101.81 or 84% of all CDBG housing expenditures.

In 2019, housing activities for the prevention or elimination of slum and blight expended \$115,386.44 or 16% of all CDBG housing expenditures.

Objective B: Encourage the integration of population groups within the community and promote an increase in the diversity and vitality of neighborhoods.

The City has maintained an integrated environment by supporting its fair housing programs with its CDBG funds. The following organizations promote integration and strengthen the community by insuring that all residents have options to remedy discrimination.

Fair Housing Activities (HUD #1211) Heights Community Congress completed 10 paired sales and rental audits in 2019. No fair housing complaints were reported. Additionally, the City conducted a landlord training seminar in May of 2019. A total of \$11,384.60 was expended for Fair Housing programs.

FutureHeights (HUD #1212) 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 Citizen Advisory Committee. 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 2019, a total of \$42,301.00 was expended.

Heights Community Congress (HUD #1211) Diversity Programming by Heights Community Congress, "Diversity in all its Facets", provided activities for Cleveland Heights citizens where racial and cultural differences were discussed in nonthreatening and supportive environment. This reduces tension among people from diverse backgrounds and reinforces people's natural sense of fairness and equity. CDBG funds are used for administrative expenses. \$6,000 was expended on this activity in 2019.

Fair Housing/Neighborhood Engagement Programs represents 3% of the total CDBG funds expended, or \$59,685.60 in 2019. Fair Housing Programs are included under the administrative cap.

Objective C: Maximize the independence of targeted population groups by providing services which expand choices.

The following public service activities offer senior residents the opportunity to expand their mobility, independence and individuality. In 2019, the City expended a total of \$32,397.61 or 2% of the total CDBG amount expended, on public service activities that address Objective C.

Office on Aging - Senior Services (HUD #1225) 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 2019, 286 unduplicated senior adults were assisted 418 times by the Office on Aging. 93% are LMI. This activity qualifies as serving LMI limited clientele. In 2019, the service expended \$32,397.61.

Objective D: Maintain safe, functional and healthy neighborhoods by providing services which improve the physical environment, especially in low- and moderate-income areas.

This objective 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. Priority is given to projects that provided benefits to LMI areas. In 2019, a total of \$229,179.66 or 13% of the total CDBG expenditures was used for this objective.

Annual Streets Improvement Program (HUD #1253) CDBG funds were used to leverage the City's annual street improvement program. These funds were targeted to accessibility improvements that improve the quality of life for persons with mobility disabilities and vision impairment. In 2019, \$192,438.67 in CDBG funds was expended to install and replace ADA compliant curb ramps throughout the City. This program is intended to be a 5-year program to address all of the substandard crossings throughout the City. This project qualifies because it primarily aids the presumed benefit class of persons with a severe disability.

Cedar Taylor Development Association (HUD #1254) The Cedar Taylor Business Association is a voluntary not-for-profit organization dedicated to the continued growth of the Cedar Taylor business district. There are approximately 30 businesses in the district. The district is within an Improvement Target Area and was within an LMA prior to the map change in the Spring of 2019.

The Cedar Taylor Business Association works to provide a cohesive retail environment for business owners and shoppers. They work to promote their district through neighborhood marketing and physical improvements. In 2014, CDBG funds were used to complete a streetscape beautification study for the district. They are now implementing the plan with the help of CDBG funds as well as donations from local businesses.

In 2019, the Cedar Taylor Development Association completed several projects aimed at reducing slum and blight in an improvement target area. The activities included streetscape enhancement design services and the beautification of 20 planters and 19 tree pits.

Neighborhood Relations Program (HUD #1244) This program addresses issues that affect the quality of life for residents of LMI neighborhoods. Problems addressed by staff may include loud parties, run-down properties and inappropriate or illegal behavior. Residents and the Neighborhood Relations Specialist work together to develop strategies and solutions that will improve the quality of life in their neighborhoods. The Specialist reports directly to the Housing Director and works closely with the City's Community Relations staff and the Police Department. When appropriate, he also works with various social service agencies. This is a Public Service activity. CDBG funds are used for the portion of work done by this staff position in qualifying LMI neighborhoods of the City. A total of \$27,490.99 was expended in 2019. 70 problem properties were addressed, directly benefitting 2,382 people living in or adjacent to these properties.

Objective E: Provide support services to youth and identifiable low- and moderate income groups in the community.

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.

The total amount of CDBG funds expended in 2019 on public service for youths and identifiable low- and moderate-income groups outlined in Objective E was \$86,038.45 or 5% of the total expenditures.

Heights Emergency Food Center (HUD #1223) 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 \$25,129.20 in 2019. This program served 3,419 unduplicated extremely low-income persons last year.

Start Right Community Development Corporation Food Program (HUD # 1222) Start Right 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 Center for the operation of the program, totaling \$7,530.00 in 2019. This program served 792 unduplicated low-income persons last year.

Gesher (HUD #1224) 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 2019, 359 persons were assisted of which 96% or 345 were low-to-moderate income persons. \$5,000 was expended in 2019.

Open Doors Academy (HUD #1176 & #1220) This program is an after-school program for middle school youth (#1176) and high school youth (#1220). 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 2019, the middle school program served 97 unduplicated students, of which 77 or 79% are from LMI households and expended \$12,724.50. In 2019, the High School Program served 49 unduplicated students, of which 34 or 69% are from LMI households and expended \$7,500.00. These activities qualify as serving LMI limited clientele with income being verified through documentation of family size and income.

Family Connections (HUD #1216 & #1217) In 2019, Family Connections operated two programs, the Family-School Connection (#1216) and the Parent Café (#1217).

The Family-School Connection (#1216) 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 2019, this agency served 471 unduplicated children, delivering 1,017 units of service. Of the 471 children served, 263 or 56% were from LMI households. \$15,000 of CDBG funds were expended on this program in 2019.

The Parent Café (#1217) 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 2019. 11 families or 79% were reported as being LMI households. No funds were expended in 2019, however, expenses were incurred by the subrecipient and will be reimbursed in 2020.

Lake Erie Ink (HUD #1221) 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 2019, the program served 45 unduplicated youth, of which 31 or 69% are from LMI households. \$13,154.75 of CDBG funds were expended on this activity in 2019.

The Bhutanese Community of Greater Cleveland (HUD #1226) The Bhutanese Community of Greater Cleveland is a newly formed community group tasked with the job of preparing refugees and other low- and moderate-income residents for the workforce. In 2019, they served 28 LMI households and expended \$1,300.00.

GOAL II: EXPAND ECONOMIC OPPORTUNITIES TO PERSONS OF LOW- AND MODERATE-INCOME.

The accomplishments of this goal, and its objectives, are primarily carried out through the City's Departments of Planning and Economic 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.

Objective A: Alleviate physical and economic distress and create viable commercial areas through the prevention of the deterioration of commercial districts.

Storefront Renovation Rebate Program - S/B (HUD #1249) 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 2019 with 2 being completed by December 31, 2019. The 2 completed projects were 2236-2260 Lee Road (12 storefronts) and 2179 Lee Road (1 Storefront). The 2 projects still underway are 3970 Mayfield Road (7 storefronts) and 1429 Warrensville Center Road (3 storefronts). In 2019, the program expended \$52,938.61.

Storefront Renovation Rebate Program - LMI (HUD #1248) The counterpart to the slum and blight program described above, this program targets businesses serving LMI neighborhoods. This program did not expend any funds in 2019.

Storefront Renovation Loan Program - S/B (HUD #1251) 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. In 2019, 1 project was completed, 2236-2260 Lee Road (12 storefronts), and 2 were started, 3970 Mayfield Road (7 storefronts) and 1429 Warrensville Center Road (3 storefronts). \$97,331.76 was expended in this program in 2019. \$27,773.16 in program income was received in 2019 due to this program.

Storefront Renovation Loan Program - LMI (HUD #1250) This program offers loans for exterior renovations for businesses that serve LMI areas throughout the City. No funds were expended in 2019.

Economic Development Program Delivery Costs (HUD #1245 & #1246) CDBG funds provide salaries and supplies for economic development program operations, including the Storefront Renovation Program (HUD #1248, #1249 #1250 and #1251) and the Commercial Loan Program (HUD #1247). In 2019, CDBG contributed \$125,363.39 to economic development program delivery costs. Of this amount, \$81,486.20 was for LMI activities (HUD #1245) and \$43,877.19 was for slum and blight activities (HUD #1246).

The total amount of CDBG funds expended on alleviating physical and economic distress and creating viable commercial areas as outlined in Goal II Objective A was \$275,633.76 or 16% of the total expenditures.

Objective B: Stimulate private investment to create and retain employment opportunities, especially for low- and moderate-income persons.

Commercial Loan Program - LMI (HUD #1247) This program provides gap financing for worthy LMI eligible development projects. In 2019, 1 project was completed, expending \$150,000. This project assisted a new restaurant business in the Cedar Fairmount District resulting in the creation of 16 jobs, 14, or 88%, of which were held by low- and moderate-income job seekers. The Commercial Loan Program received \$134,377.18 in program income during year 2019 from repaid commercial loans.

Microenterprise Loan Fund Program (HUD #1252) The purpose of the Microenterprise Loan Fund (MLF) is to make adequate and affordable credit more readily available to existing and start-up business in the City. The MLF is intended to aid businesses which will create and/or retain jobs, along with increasing the commercial base of the community. In 2019, 1 microenterprise, a small clothing retailer, was assisted, creating 1 job for a low- and moderate-income job seeker. The Program expended \$10,000 for this project.

Programs that addressed Goal II Objective B expended \$160,000 or 9% of the total CDBG expenditure. The total amount of CDBG funds expended on commercial area improvement and revitalization and the creation and retention of employment opportunities was \$453,633.76 or 25% of the total expenditures.

Administration, Planning & Capacity Building

CDBG Administration (HUD #1206) During 2019, \$104,444.84 was expended for the ongoing administration of the City's CDBG program including salaries, operating costs and planning costs.

CDBG Indirect Costs (HUD #1207) During 2019, \$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 #1208) Funds provide accounting and financial services to assist the administration of the City's CDBG program. In 2019, \$13,361.37 was expended.

Cain Park Village Trailway Planning Study (HUD #1209) During 2019, \$18,657.56 was expended to study the potential for expanded access to recreation and traffic safety in Census Tract 1407.01, a low and moderate-income area.

Geographic Information Systems (HUD #1210) 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 2019, \$36,225.65 was expended.

The Administration, Planning & Capacity Building activities expended \$207,689.42 or 12%. The total CDBG administration, fair housing and planning costs were \$267,375.02 or 15% of the total CDBG entitlement amount 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

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 in 2013 in partnership with the Northeast Ohio Sustainable Communities Consortium. Many of the impediments identified in the 2013 AI emphasize the impediments identified in the 2011 plan. 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.

A. Public Sector

i. Administrative

a. *Members of the protected classes could be more fully represented on appointed boards and commissions involved in housing and housing-related decisions.*

There is an absence of persons with disabilities on selected appointed boards and commissions in Cleveland Heights. Representation among Blacks and females is also low. The experiences and perspectives of members of the protected classes would enhance the decision-making process in the City and offer the opportunity for advancing fair housing choice in all aspects of City government.

Proposed Action: Conduct a survey of each of the appointed citizens who are currently members of public boards or commissions to identify members of the protected classes. The survey should identify the race, gender, ethnicity, and disability status of every appointed board and commission member. Thereafter, each new appointment should be surveyed in a

similar manner. Records on the membership of appointed boards and commissions will assist City's officials in making appointments that reflect the City's diversity.

The makeup of the City's boards and commissions has been surveyed with members of protected classes identified. New appointments will be recorded and every effort will be made to reflect the City's diversity in their selection.

Additionally, through FutureHeights' Community Capacity Building Program, underrepresented groups and protected classes are being targeted to participate in the program in order to empower them to apply for City boards and commissions.

Lastly, the City of Cleveland Heights is working with local accessibility advocates to ensure that planning processes include the perspectives of those with a variety of physical and cognitive disabilities.

ii. Programmatic

a. *The majority of fair housing complaints in Cleveland Heights filed with HUD and OCRC involved familial status as the basis for discrimination. Race was the second most common basis.*

While one-quarter of complaints filed through HUD and OCRC in the City were found to be without probable cause, the predominance of complaints on the basis of familial status and race indicate that discrimination persists. Heights Community Congress (HCC) routinely conducts paired testing for fair housing discrimination based on race but not familial status.

Proposed Action I: Continue to provide fair housing education and outreach efforts to landlords, building owners, rental agents, and Realtors.

Proposed Action II: Incorporate fair housing training as a mandatory requirement for the City's landlord licensing requirements.

Landlord training has been conducted by the Cleveland Heights Police Department, Housing Inspections Department and Planning and Development Department. These are open to landlords, building owners and rental agents. Seminars are also held for Real Estate Professionals. Fair Housing education is included in each of the seminars.

Fair Housing training was held for City Staff including employees from the following departments: Housing Inspections, Economic Development, Planning, Law, Fire Inspections as well as SafeBuilt, which manages the duties formerly covered by the Building Department.

The City and School Board conducted a joint "Groundwater Training" with various City and School District staff that educated participants about systemic and institutional racism. The training was conducted by the Racial Equity and Inclusion program at Cleveland Neighborhood Progress. Staff also attended a 2-day "Phase I" seminar. Funds were set aside in 2020 for more staff and partners to attend the 2-day seminar.

Proposed Action III: Expand HCC paired testing for fair housing discrimination to include familial status.

The Fair Housing Discrimination contract for paired testing includes familial status as a requirement of the testing.

b. Despite affirmative marketing initiatives implemented by the City, there remain areas of concentration of Black residents.

Ten of the City's census tracts include areas of concentration of Black residents. While investing CDBG, HOME and NSP funds in areas requiring revitalization and redevelopment is important, affirmatively furthering fair housing also involves using these resources to create new affordable housing opportunities outside areas of minority concentration for members of the protected classes.

Proposed Action: Continue to fund the administrative costs of the Heights Fund. This activity also should be reported in the City's CAPER even though City general funds are used to support this activity.

The City intends to continue to fund the administrative costs of The Heights Fund and will report on this activity in the CAPER.

c. The City's Zoning Ordinance is in violation of the Fair Housing Act.

The City's zoning ordinance is in violation of the Fair Housing Act by the manner in which "family" is defined. The definition should

not distinguish between related and unrelated persons, nor impose numerical limitations on the number of persons that may constitute a family.

The City's zoning ordinance is in violation of the Fair Housing Act by the manner in which group homes are defined and regulated. Group homes for persons with disabilities cannot be treated any less favorably than other single family dwellings.

Proposed Action: Amend the City's zoning ordinance to comply with the Fair Housing Act.

The City's Zoning Ordinance was revised and an amending ordinance was proposed in 2017. The revised ordinance was passed by Cleveland Heights City Council on January 16, 2018.

B. Private Sector

i. Mortgage Lending

a. Mortgage loan denials and high-cost lending disproportionately affect minority applicants in Cleveland Heights, similar to national trends.

Between 2006 and 2008, the mortgage denial rate for Blacks was three times that of Whites. In 2008, 33.1% of loans submitted by Black households were denied, compared to 9.2% among Whites.

Upper income Black households had a denial rate three times that of white upper income households, and more than twice that of White lower income households. While this fact alone does not imply an impediment to fair housing choice, the pattern is consistent with discrimination.

Minority households are disproportionately represented in high-cost lending. Among lower income applicants, Black households represented 70.3% of all high-cost loans between 2006 and 2008, though they only comprised 35.2% of all originations. Among upper-income applicants, Black households accounted for 62.4% of high costs loans but only 21.1 % of originations.

Proposed Action I: Continue to engage HUD certified counselors to target credit repair education through existing advocacy organizations that work with minority populations on a regular basis.

The City continues to partially fund the Housing Counseling program at the Home Repair Resource Center. The counselor

is HUD certified.

Proposed Action II: Continue to facilitate home ownership workshops and training sessions, with special outreach to impacted neighborhoods and to engage members of the protected classes.

Home Repair Resource Center, which is partially funded by CDBG through the City, holds home ownership workshops and training sessions for Cleveland Heights residents and those who are considering purchasing a home in the City. All buyers who purchased a NSP renovated property or access the City's Down Payment Assistance program are required to complete an eight hour course in home ownership and home maintenance.

Proposed Action III: Expand HCC paired testing for fair housing discrimination to include mortgage lending.

The City is an active member of the Greater Cleveland Reinvestment Coalition, a non-profit coalition of housing agencies and municipalities organizing around banking practices through the monitoring and enforcement of the Community Reinvestment Act and the execution of Community Benefits Agreements. The City is also a member of the National Community Reinvestment Coalition and the Ohio Fair Lending Coalition.

ii. Real Estate Advertising

a. *Several local real estate advertisements are publishing language that is in violation of the Fair Housing Act.*

Rental unit ads in The Plain Dealer and the Sun Press, as well as in the monthly independent publication Apartments for Rent, included the prohibition of pets and additional pet deposits, both of which violate the Fair Housing Act. This type of language could discourage persons with disabilities from applying for these units.

Proposed Action: Communicate with the publishers of these advertisements that the language allowed in advertisements prohibiting pets and requiring pet deposits is in violation of the Fair Housing Act as these statements could discourage persons with disabilities from applying to otherwise accessible units. The City should strive to engage the publishers in positive dialogue so as to have them

change their publication policies.

Information will continue to be shared with landlords, rental agents and building owners during the Landlord Seminars about this issue. The City will attempt to ensure that they are aware of their responsibilities regarding the inclusion of language in their ads that includes the prohibition of pets and additional pet deposits. We will instruct them in their responsibility to ensure that persons with disabilities are not discouraged from applying for units.

In 2019, the City of Cleveland Heights contracted with the Fair Housing Center for Rights and Research in order to complete a new Analysis of Impediments to Fair Housing Choice. The new AI will be released in April of 2020.

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 Community Development Block Grant, 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 2019, 94 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. Home Repair Resource Center 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 2019, four LMI households were assisted utilizing a total of \$44,000 of HOME funds and leveraging \$33,194 in private down payment funds and \$367,012 in private mortgage funds.

Cleveland Heights worked with Home Repair Resource Center 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 receive 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.

Currently, the City of Cleveland Heights has not identified a homelessness problem within our community. 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 actively 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 the Department of Housing and Urban Development. In 2019, the City of Cleveland Heights assisted 20 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 Food Center, which provide very low-income families a three-day supply of food once a month. 4,211 households were assisted in 2019.

The City's Housing Preservation Office and Home Repair Resource Center, 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. Home Repair Resource Center and FutureHeights have established good working relationships with three area banks that contribute to their ability to leverage additional funds. During the past year, our Down Payment Assistance Program leveraged a total of \$ 400,206 in private down payment and private mortgage funds.

DISPLACED INDIVIDUALS

There was no displacement of individuals for any of our programs during 2019. 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 2019.

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 2019, the Citizens Advisory Committee (CAC) made recommendations on the funding of organizations for Year 45. 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 first quarter of 2011 and adopted by City Council in March 2011.

There were no changes to the program objectives in 2019. Should we decide to make changes to our objectives at any time, we would follow our Citizen Participation Plan as outlined in Appendix A. Our 22 person Citizens Advisory Committee meets monthly and is well versed in the CDBG program as well as in touch with the needs of the Cleveland Heights community.

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 the same goals and objectives for 2019. As a result of positive experiences in Year 45, the City officials believed that citizen benefits could be expanded with the continuation of the same objectives in the upcoming year.

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 2019.

A copy of this document, the Consolidated Annual Performance and Evaluation Report (CAPER), was made available for public comment from March 13, 2020 through March 30, 2020. A legal notice was placed in our local newspaper, The Sun Press, on March 12, 2020 notifying the public of the availability of the CAPER for review and comment. The CAPER was available at Cleveland Heights City Hall and the Cleveland Heights-University Heights Main Library. It was also available for review on the City's website. Additionally, the CAPER was made available to our Citizens Advisory Committee at a public meeting on March 24, 2020.

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. The Chart in Appendix C summarizes activities completed during FY 2019.

Programs have been developed to assist low-and moderate-income homeowners with health and safety concerns and minor repairs. The Community Development Block Grant 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 70 households in 2019, under our stated goal of assisting 81 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 Loans programs administered by the City's Housing Preservation Office (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, the Home Repair Resource Center (HRRC). HRRC's programs utilize Community Development Block Grant funds to leverage private loan dollars from banks. The Single-Family Rehabilitation strategy was projected to assist 19 households in 2019; 11 households were served. In addition, 128 emergency board-ups/special clean-ups 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 2019, this program had a goal of assisting 10 households; the program assisted 20 households under a contract that went into effect in 2018.

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 2019, 4 LMI households were assisted, short of the goal of 6. Cleveland Heights also encouraged Home Repair Resource Center 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 2019, 94 housing units assisted by the City of Cleveland Heights' housing programs eliminated at least one significant health and safety deficiency.

The Citizens Advisory Committee and City staff continues 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 results of the strong CDBG and HOME

activities described in this CAPER. In summary, the City 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

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. All meetings are held at Cleveland Heights City Hall and are open to the public. Notice of the time and place for their meetings and all Public Hearing is sent to the local newspaper and library a minimum of ten days before each meeting. They are also listed on the calendar on the City of Cleveland Heights website and government television station.

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	Public Hearing Review Goals & Objectives, determine needs for following year
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.

All public meetings and hearings are held in the Cleveland Heights City Hall, a handicapped accessible building. 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 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.

**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 for that year.
 - d. An activity change occurs which will require displacement of persons, especially LMI persons.

Adopted 1/16/2018

2019 Housing Rehab Programs Performance Review

City of Cleveland Heights Completed Housing Units		Number served by income % of Area Mean Income Owner Occupied			Number served by income % of Area Mean Income Renter Occupied									
Program	2019 Plan Projections	0 - 30	31 - 50	51 - 80	Section 215 Units	0 - 30	31 - 50	51 - 80	Section 215 Units	2019 Total Serviced	HUD-CPD Funds		Leveraged Funds	
											CDBG	Home	Other Public	Other Private
MINOR HOME REPAIRS	56	9	16	16	0	0	0	0	0	41	\$94,103.75	\$0.00	\$0.00	\$27,123.18
HPO Violation Repair Program for Seniors	20	4	11	8	0	0	0	0	0	23	\$34,187.75	\$0.00	\$0.00	\$3,587.00
HPO Short Term Deferred Loan	1	0	1	0	0	0	0	0	0	1	\$3,220.00	\$0.00	\$0.00	\$0.00
HPO Strategic Home Repair Program	25	4	2	5	0	0	0	0	0	11	\$47,456.00	\$0.00	\$0.00	\$2,760.00
HRRC Senior Home Stability	10	1	2	3	0	0	0	0	0	6	\$9,240.00	\$0.00	\$0.00	\$20,776.18
HOUSING REHABILITATION	19	1	5	5	2	0	0	0	0	11	\$11,955.00	\$52,520.00	\$0.00	\$27,380.00
HRRC ASSIST Programs*	15	0	4	5	0	0	0	0	0	9	\$11,955.00	\$0.00	\$0.00	\$21,235.00
HPO No Interest Loan	2	0	0	0	0	0	0	0	0	0	\$0.00	\$0.00	\$0.00	\$0.00
HPO Deferred Loan	2	1	1	0	2	0	0	0	0	2	\$0.00	\$52,520.00	\$0.00	\$6,145.00
EXTERIOR PAINT	25	4	11	14	0	0	0	0	0	29	\$82,045.00	\$0.00	\$0.00	\$800.00
Lead Safe/Healthy Homes	10	0	8	4	0	0	0	8	0	20	\$0.00	\$0	\$208,646.25	\$42,023.75
Homebuyer Assistance	6	0	1	3	4	0	0	0	0	4	\$0.00	\$44,000	\$0.00	\$400,205.70
Total	116	14	41	42	6	0	0	8	0	105	\$188,103.75	\$96,520.00	\$208,646.25	\$497,532.63
													TOTAL LEVERAGED	\$706,178.88

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

2019 PERFORMANCE OUTCOME

City of Cleveland Heights FY 2019 CAPER–CDBG Activities*

Project	Objective	Outcome	Indicator	Amount
Administrative Cap				
CD Administration	N/A	N/A	N/A	\$139,444.84
CDBG Finance Administration	N/A	N/A	N/A	\$13,361.37
Fair Housing Activities	N/A	N/A	N/A	\$17,384.60
Cain Park Village Trailway Planning Study	N/A	N/A	N/A	\$18,657.56
FutureHeights	N/A	N/A	N/A	\$42,301.00
GIS	N/A	N/A	N/A	\$36,225.65
Subtotal				\$ 267,375.02
Public Service				
Lake Erie Ink	Suitable Living	Accessibility	45 People	\$13,154.75
Heights Emergency Food Ctr.	Suitable Living	Accessibility	3,419 People	\$25,129.20
Open Doors Academy	Suitable Living	Accessibility	146 People	\$20,224.50
BCGC	Economic Opportunities	Accessibility	28 People	\$1,300.00
Housing Counselor	Suitable Living	Accessibility	260 People	\$22,613.28
Neighborhood Relations	Suitable Living	Accessibility	2,382 People	\$27,490.99
Family Connections	Suitable Living	Accessibility	485 People	\$15,000.00
Start Right Food Center	Suitable Living	Accessibility	792 People	\$7,530.00
Gesher	Suitable Living	Accessibility	359 People	\$5,000.00
Office on Aging Senior Services	Suitable Living	Accessibility	418 People	\$32,397.61
Subtotal				\$ 169,840.33
Housing				
Home Repair Resource Center				
Administration LMI	Decent Housing	Affordability	**	\$101,445.70
Assist Incentive Grant	Decent Housing	Affordability	7 Units	\$8,000.00
Assist Deferred Loan Match	Decent Housing	Affordability	2 Unit	\$3,955.00
Senior Home Stability Grant	Decent Housing	Affordability	6 Units	\$9,240.00
Housing Preservation Office				
Administration LMI	Decent Housing	Affordability	**	\$234,514.97
Administration S & B	Suitable Living	Sustainability	**	\$78,171.66
Exterior Paint Program	Decent Housing	Sustainability	29 Units	\$82,045.00
Violation Repair Program	Decent Housing	Sustainability	23 Units	\$34,187.75
Nuisance Abatement	Suitable Living	Sustainability	128 Units	\$37,214.78
Short Term Loan	Decent Housing	Sustainability	1 Units	\$3,220.00
Strategic Home Repair	Decent Housing	Sustainability	11 Units	\$47,456.00
LMI Code Enforcement	Decent Housing	Sustainability	518 Units	\$53,424.11
Subtotal				\$ 692,874.97

City of Cleveland Heights FY 2019 CAPER – CDBG Activities				
Project	Objective	Outcome	Indicator	Amount
Public Facilities				
Street Improvement Program	Suitable Living	Sustainability	4,990 People	\$192,438.67
Cedar Taylor Development Assoc.	Suitable Living	Sustainability	790 People	\$9,250.00
Subtotal				\$201,688.67
Economic Development				
Administration LMI	Economic Opportunities	Sustainability	**	\$81,486.20
Administration S & B	Economic Opportunities	Sustainability	**	\$43,877.19
Storefront Rebate Program S&B	Economic Opportunities	Sustainability	13 Businesses	\$52,938.61
Storefront Loan Program S&B	Economic Opportunities	Sustainability	12 Businesses	\$97,331.76
Commercial Revolving Loan LMI	Economic Opportunities	Sustainability	1 Business	\$150,000.00
Microenterprise Loan Fund LMI	Economic Opportunities	Accessibility	1 Business	\$10,000.00
Subtotal				\$ 435,633.76
Total 2018 CDBG Program				\$1,767,412.75

* Does not include prior year expenses drawn in 2019.

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