



# Franklin County, Ohio 2026 Annual Action Plan

SUBMITTED TO THE FRANKLIN COUNTY BOARD OF  
COMMISSIONERS FOR APPROVAL ON JUNE 2, 2026

## **Executive Summary**

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

#### **1. Introduction**

The 2026 U.S. Department of Housing and Urban Development (HUD) Annual Action Plan provides a summary of the actions, activities, and programs Franklin County will implement during the second year (2026) of the Consolidated Plan (2025-2029) period to address the priority needs and goals identified by the Strategic Plan. Overall, the Action Plan functions as an annual guide and budget to explain how federal resources will be used to improve conditions for LMI households, homeless persons, and other non-homeless special needs populations in Franklin County.

#### **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.

2025 was a period of change and momentum for Franklin County Economic Development and Planning, including full fiscal reconciliation and a 2025 CDBG Award Cycle designed to award bank 2019, 2020, 2021, 2022, 2023, 2024, and 2025 funds, in an effort to meet our timeliness goals. We submitted substantial amendments to reallocate these past funds to 10 new CDBG projects. In addition, we formally revised our HOME-ARP Allocation Plan to allow for Tenant-Based rental assistance, which was identified as a high priority community need in our May 2025 community survey. Franklin County continues to develop its Community Development team, with a new Community Development Official, and two new Community Development Officials starting in January and April 2026—all of whom have exemplified the skills needed to position the department for success, in a short period of time.

With our 2026 Annual Action Plan, we aim to allocate our funding in similar ratios as in past plans, using high-level project categories that align with the goals in our 2025-2019 Consolidated plan and allow us to award funds to activities within those project categories.

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

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

In 2025, Franklin County used federal and local resources to further its overall Annual Action Plan goals with respect to community development, housing, homelessness prevention, and special needs populations to serve extremely low, very low, low, and moderate-income persons. As indicated in the Annual Action Plan, these goals are to provide affordable housing opportunity, neighborhood and target area revitalization, and economic development and economic opportunity.

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

Summary from citizen participation section of plan.

See attachment labeled “Additional Characters”

#### **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.

TBD

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

TBD

#### **7. Summary**

For Program Year 2026, HUD has allocated the Community Development Block Grant (CDBG), Home Investment Partnerships Funds (HOME), and Emergency Solutions Grant (ESG) in the following amounts below. Franklin County intends to spend the funds on the various eligible activities outlined under each funding source. The geographic area includes Franklin County, excluding the City of Columbus.

CDBG - \$2,199,705

- Preserve and Expand Affordable Rental Housing
- Improve Access to Public Services
- Support Sustainable Economic Development
- Provide for Planning and Administration

HOME - \$891,916.56 award, plus allocations of \$608,137 in 2025 Program income

- Preserve and Expand Affordable Rental Housing
- Expand Affordable Homeownership Opportunities
- CHDO Development

- Provide for Planning and Administration

ESG - \$178,113

- Support Homelessness Prevention and Services

## 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 | FRANKLIN COUNTY | Economic Development and Planning |
| HOME Administrator | FRANKLIN COUNTY | Economic Development and Planning |
| ESG Administrator  | FRANKLIN COUNTY | Economic Development and Planning |

**Table 1 – Responsible Agencies**

### Narrative (optional)

### Consolidated Plan Public Contact Information

Franklin County Economic Development and Planning Dept., 150 South Front Street, FSL Suite 10, Columbus, OH 43215, or via email at [CommunityDevelopment@FranklinCountyOhio.gov](mailto:CommunityDevelopment@FranklinCountyOhio.gov) or via phone at 614-525-5629

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

### **1. Introduction**

Franklin County consulted with a variety of public and non-profit housing and service providers while developing the 2026 Annual Action Plan. The details of that consultation are described in Table 2- Agencies, groups, organizations who participated.

**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(l))**

See attachment labeled "Additional Characters".

**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.**

See attachment labeled "Additional Characters".

**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**

See attachment labeled "Additional Characters".

**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>                                                                                                                                   | Community Housing Network                                                                                                                                                                                                                       |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Housing<br>Services-homeless                                                                                                                                                                                                                    |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Housing Need Assessment<br>Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth                                                        |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment.<br>Outcome: Connection and support regarding needs of homeless population and permanent supportive housing. |
| 2 | <b>Agency/Group/Organization</b>                                                                                                                                   | Columbus Chamber Women's Collaborative                                                                                                                                                                                                          |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-Employment                                                                                                                                                                                                                             |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Economic Development                                                                                                                                                                                                                            |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment.<br>Outcome: Highlighted opportunities needed for women-owned small businesses.                              |

|   |                                                                                                                                                                    |                                                                                                                                                                                                                                       |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | <b>Agency/Group/Organization</b>                                                                                                                                   | Eastland Development for Growth and Equity (EDGE)                                                                                                                                                                                     |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Housing<br>Services-homeless<br>Services-Health<br>Services-Education<br>Services-Employment<br>Service-Fair Housing                                                                                                                  |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Economic Development                                                                                                                                                                                                                  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment. Outcome: Connection with local neighborhood to align on priorities.                               |
| 4 | <b>Agency/Group/Organization</b>                                                                                                                                   | Nehemiah House of Refuge (NHR)                                                                                                                                                                                                        |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-homeless<br>Services-Health<br>Services-Education                                                                                                                                                                            |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Economic Development                                                                                                                                                                                                                  |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment. Outcome: Connection to better understand local service needs from non-profit serving at risk men. |
| 5 | <b>Agency/Group/Organization</b>                                                                                                                                   | Coming from the Heart Ministries                                                                                                                                                                                                      |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-Health<br>Services - Victims                                                                                                                                                                                                 |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Homeless Needs - Chronically homeless                                                                                                                                                                                                 |



|   |                                                                                                                                                                    |                                                                                                                                                                                                                                                      |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment. Outcome: Connection with local nonprofit providing addiction and homelessness services and transitional housing. |
| 6 | <b>Agency/Group/Organization</b>                                                                                                                                   | The P.E.E.R. Center                                                                                                                                                                                                                                  |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-Health<br>Services - Victims                                                                                                                                                                                                                |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Non-Homeless Special 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> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment. Outcome: Connection with local nonprofit providing treatment for addiction, mental illness, and trauma.          |
| 7 | <b>Agency/Group/Organization</b>                                                                                                                                   | The Platform                                                                                                                                                                                                                                         |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-Children<br>Services-Education                                                                                                                                                                                                              |
|   | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Economic Development                                                                                                                                                                                                                                 |
|   | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment. Outcome: Conveyed need for youth STEM.                                                                           |
| 8 | <b>Agency/Group/Organization</b>                                                                                                                                   | COMMUNITY SHELTER BOARD                                                                                                                                                                                                                              |
|   | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-homeless                                                                                                                                                                                                                                    |

|    |                                                                                                                                                                    |                                                                                                                                                                                                                                    |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Homeless Needs - Chronically homeless<br>Homeless Needs - Families with children<br>Homelessness Needs - Veterans<br>Homelessness Needs - Unaccompanied youth<br>Homelessness 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> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment.<br>Outcome: Connection with our Local Community of Care.                                       |
| 9  | <b>Agency/Group/Organization</b>                                                                                                                                   | National Church Residences                                                                                                                                                                                                         |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                              | Housing<br>Services-Elderly Persons                                                                                                                                                                                                |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Housing Need Assessment                                                                                                                                                                                                            |
|    | <b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment.<br>Outcome: Coordination with provider of low income housing for the elderly.                  |
| 10 | <b>Agency/Group/Organization</b>                                                                                                                                   | Kingdom Image Arts                                                                                                                                                                                                                 |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services-Children<br>Services-Elderly Persons<br>Services-Persons with Disabilities<br>Services-Education                                                                                                                          |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Non-Homeless Special 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> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment.<br>Outcome: Coordination with provider of arts education and support for all through the arts. |

|    |                                                                                                                                                                    |                                                                                                                                                                                                                                |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 11 | <b>Agency/Group/Organization</b>                                                                                                                                   | Legal Aid Society of Columbus                                                                                                                                                                                                  |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                              | Legal Services                                                                                                                                                                                                                 |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Non-Homeless Special 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> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment.<br>Outcome: Coordination with needs of local community in need of legal support.           |
| 12 | <b>Agency/Group/Organization</b>                                                                                                                                   | Affordable Housing Alliance of Central Ohio (AHACO)                                                                                                                                                                            |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services - Housing<br>Service-Fair Housing                                                                                                                                                                                     |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Housing Need Assessment<br>Public Housing Needs<br>Homelessness Strategy<br>Non-Homeless Special 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> | Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment.<br>Outcome: Coordination with needs of local community with regard to local housing needs. |
| 13 | <b>Agency/Group/Organization</b>                                                                                                                                   | The Ohio Hispanic Coalition                                                                                                                                                                                                    |
|    | <b>Agency/Group/Organization Type</b>                                                                                                                              | Services - Housing<br>Services-Children                                                                                                                                                                                        |
|    | <b>What section of the Plan was addressed by Consultation?</b>                                                                                                     | Non-Homeless Special Needs                                                                                                                                                                                                     |

|  |                                                                                                                                                                           |                                                                                                                                                                                                                                          |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <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>Representative attended a public hearing on the 2026 AAP and was presented a draft of the action plan for their review and comment. Outcome: Coordination with needs of local community with regard to the population they serve.</p> |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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

The County consults with as broad of a range of agencies as possible. No agency types were not consulted.

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

| Name of Plan               | Lead Organization                              | How do the goals of your Strategic Plan overlap with the goals of each plan?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Continuum of Care          | Community Shelter Board                        | The goals of the Strategic Plan portion of the Consolidated Plan were developed in close coordination with those of the Rebuilding Lives Plan, which is Columbus' Continuum of Care planning document. The Rebuilding Lives plan is made up of a comprehensive and interrelated set of strategies to decrease the number of people who experience homelessness. The Community Shelter Board works with the County and other partner agencies on four goals in the Rebuilding Lives plan: 1) access; 2) crisis response; 3) transition; and 4) advocacy. The Consolidated Plans Strategic Goals align with and further support these goals. |
| PHA 5-Year and Annual Plan | Columbus Metropolitan Housing Authority (CMHA) | CMHA is the City of Columbus and Franklin County's Public Housing Authority. The County reviewed CMHA's PHA 5-Year and Annual Plan when developing Strategic Goals related to public housing. The Strategic Plan specifies that Franklin County is committed to collaborating and cooperating with CMHA on the redevelopment of public housing sites and units as outlined in the PHA 5-Year Plan.                                                                                                                                                                                                                                         |

| Name of Plan                                   | Lead Organization                    | How do the goals of your Strategic Plan overlap with the goals of each plan?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------------------------------------|--------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Analysis of Impediments to Fair Housing Choice | Franklin County and City of Columbus | The Analysis of Impediments (AI) to Fair Housing Choice outlines how Franklin County will take steps to affirmatively further fair housing. The purpose of these actions is to ensure housing choice for all residents of Franklin County by eliminating housing discrimination on the basis of race, color, religion, sex, disability, familial status, national origin, sexual orientation, or gender identity. The AI's Fair Housing Action Plan was considered throughout the Strategic Planning process, and the goals align with and further support fair housing. |

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

### **Narrative (optional)**

The County consults with as broad of a range of agencies as possible. No agency types were not consulted.

## **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**

We held 4 public hearings in preparation for our 2026 annual action plan. We advertised Hearing 1 (February 25, 2026) in the Columbus Dispatch and via an emailed invitation to our listserv of 6,026 email recipients. The purpose of this hearing was to provide details for our upcoming AAP process. We received two comments at this hearing, and added attendee emails to our listserv for future contact.

We advertised Hearing 2 (March 24, 2026) in the Columbus Dispatch and via an emailed invitation to our listserv of 6,005 email recipients. The purpose of this hearing was to share our 2024 CAPER and provide details for our upcoming AAP process. We received a set of questions from a developer for which we created and publish formal responses on our website. We received one comment at this hearing, and added attendee emails to our listserv for future contact.

We advertised Hearing 3 (April 7, 2026) in the Columbus Dispatch and via an emailed invitation to our listserv of 5968 email recipients. The purpose of this hearing was to allow the public to provide input on housing and community development needs, present proposals, and questions, in accordance with our Citizen Participation Plan. We received one comment at the hearing, a set of questions from a developer for which we created and publish formal responses on our website, and one email request for additional hearing details. Like prior hearings we added attendee emails to our listserv for future contact.

We advertised Hearing 4 (May 6, 2026) in the Columbus Dispatch. The listserv email for this session was not sent due to capacity issues, but we advertised it on our website where the Draft Plan was posted. This hearing allowed the public an opportunity to provide comments on the draft plans and proposed activities. We received additional developer questions at this hearing for which we created and publish formal responses on our website.

The review and public comment period for our draft 2026 AAP ran from April 22, 2026, through May 22, 2026. In addition to making copies of our draft plan available on our website, copies of the draft 2026 Annual Action Plan were available for public inspection at the following locations: the Franklin County Economic Development and Planning Dept., Franklin County Board of Commissioner's Office, Gillie Community Senior and Center, The Columbus Metropolitan Library - Northern Lights Branch.

## 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          | Newspaper Ad     | <p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> | <p>A public notice was advertised in Columbus Dispatch, our major local newspaper, on February 11, 2026. Hearing was open to all community members and community partners.</p> | <p>Citizen comments attached to plan.</p> | <p>No comments were not accepted.</p>        |                     |

| 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          | Internet Outreach | <p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> | We emailed invitation to our hearing and the opportunity to comment to our listserv of 6,026 email recipients | Citizen comments attached to plan. | No comments were not accepted.               |                     |
| 3          | Public Hearing    | <p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> | 20 individuals attended our February 25, 2026 Public Hearing.                                                 | Citizen comments attached to plan. | No comments were not 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) |
|------------|-------------------|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------|---------------------|
| 4          | Newspaper Ad      | Minorities<br>Persons with disabilities<br>Non-targeted/broad community                                             | A public notice was advertised in Columbus Dispatch, our major local newspaper, on March 10, 2026. Open to all community members and community partners.                               | Citizen comments attached to plan. | No comments were not accepted.               |                     |
| 5          | Internet Outreach | Minorities<br>Persons with disabilities<br>Non-targeted/broad community<br>Residents of Public and Assisted Housing | We emailed invitation to our hearing and the opportunity to comment to our listserv of 6,005 email recipients on March 20, 2026. Open to all community members and community partners. | Citizen comments attached to plan. | No comments were not 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) |
|------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------|---------------------|
| 6          | Public Hearing   | <p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> | 8 individuals attended our March 24 Hearing.                                                                                                                         | Citizen comments attached to plan. | No comments were not accepted.               |                     |
| 7          | Newspaper Ad     | <p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p> | A public notice was advertised in Columbus Dispatch, our major local newspaper, on March 25, 2026. Hearing was open to all community members and community partners. | Citizen comments attached to plan. | No comments were not 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) |
|------------|-------------------|---------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------|---------------------|
| 8          | Internet Outreach | Minorities<br><br>Persons with disabilities<br><br>Non-targeted/broad community<br><br>Residents of Public and Assisted Housing | We emailed invitation to our hearing and the opportunity to comment to our listserv of 5968 email recipients on April 6, 2026. Open to all community members and community partners. | Citizen comments attached to plan. | No comments were not accepted.               |                     |
| 9          | Public Hearing    | Minorities<br><br>Persons with disabilities<br><br>Non-targeted/broad community<br><br>Residents of Public and Assisted Housing | 13 individuals attended our April 7, 2026 Hearing.                                                                                                                                   | Citizen comments attached to plan. | No comments were not 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) |
|------------|------------------|---------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|----------------------------------------------|---------------------|
| 10         | Newspaper Ad     | Minorities<br>Persons with disabilities<br>Non-targeted/broad community<br>Residents of Public and Assisted Housing | A public notice was advertised in Columbus Dispatch, our major local newspaper, on April 8, 2026. Hearing was open to all community members and community partners. | Citizen comments attached to plan. | No comments were not accepted.               |                     |
| 11         | Public Hearing   | Minorities<br>Persons with disabilities<br>Non-targeted/broad community<br>Residents of Public and Assisted Housing | 5 individuals attended our May 6, 2026 Hearing.                                                                                                                     | Citizen comments attached to plan. | No comments were not accepted.               |                     |

**Table 4 – Citizen Participation Outreach**

## Expected Resources

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

#### Introduction

#### 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<br>Admin and Planning<br>Economic Development<br>Housing<br>Public Improvements<br>Public Services | 2,199,705.00                     | 0.00               | 0.00                     | 2,199,705.00 | 6,079,662.00                                      | We have fully allocated older funds with our 2025 awards. |

| 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: \$     |                                                   |                                                                                                           |
| HOME    | public - federal | Acquisition<br>Homebuyer assistance<br>Homeowner rehab<br>Multifamily rental new construction<br>Multifamily rental rehab<br>New construction for ownership<br>TBRA | 891,916.56                       | 608,137.00         | 8,590,333.00             | 10,090,386.56 | 2,410,368.00                                      | We have \$8,590,333 in past funds and are actively working toward contracts for 1,236,000 of that amount. |

| 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: \$  |                                                   |                                                                     |
| ESG     | public - federal | Conversion and rehab for transitional housing<br>Financial Assistance<br>Overnight shelter<br>Rapid re-housing (rental assistance)<br>Rental Assistance Services<br>Transitional housing | 178,113.00                       | 0.00               | 0.00                     | 178,113.00 | 0.00                                              | We fully pass through to our CoC Community Shelter Board each year. |

**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**

See attachment labeled “Additional Characters

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

The County maintains a land bank which acquires parcels and structures through tax foreclosure and Neighborhood Stabilization Program (NSP) funded acquisitions. The land bank has also received demolition funds through the Neighborhood Stabilization Program, the Ohio Attorney General and the Hardest Hit funds. These cleared sites can then be put to more productive use through low-cost acquisition and redevelopment. Additionally, the land bank has adopted a land trust.

**Discussion**

The county is currently conducting a Housing Needs Assessment and plans to launch a data-driven approach to allocating HOME funds to address the affordable housing crisis affecting residents of Franklin County.



## 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 |
|------------|-----------|------------|----------|----------|-----------------|-----------------|---------|------------------------|
|            |           |            |          |          |                 |                 |         |                        |

Table 6 – Goals Summary

#### Goal Descriptions

| Goal Name                                                           | Goal Description |
|---------------------------------------------------------------------|------------------|
| <TYPE=[pivot_table] REPORT_GUID=[8259A9F3469186F518038A8E2F9CBDBA]> |                  |
|                                                                     |                  |

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The projects to be undertaken to address the priority housing and community development needs of Franklin County include the development of affordable rental and homeownership properties, public services, homeowner occupied home repair, downpayment assistance, microenterprise technical assistance, homelessness services, and administration.

#### Projects

| # | Project Name                          |
|---|---------------------------------------|
| 1 | Affordable Rental Housing Development |
| 2 | CHDO Reserve Project                  |
| 3 | CDBG Public Services Projects         |
| 5 | Owner Occupied Home Repair            |
| 6 | Down Payment Assistance               |
| 7 | Microenterprise Technical Assistance  |
| 8 | Homelessness Prevention and Services  |
| 9 | EDP Planning and Administration       |

**Table 7 - Project Information**

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

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

|   |                                                                                                |                                                                                                                                                                                                            |
|---|------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | <b>Project Name</b>                                                                            | Affordable Rental Housing Development                                                                                                                                                                      |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                            |
|   | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                            |
|   | <b>Needs Addressed</b>                                                                         | Affordable Rental Housing                                                                                                                                                                                  |
|   | <b>Funding</b>                                                                                 | HOME: \$1,216,260.72                                                                                                                                                                                       |
|   | <b>Description</b>                                                                             | HOME funds utilized to support County affordable housing efforts through tax credit developments and other leveraged approaches.                                                                           |
|   | <b>Target Date</b>                                                                             | 12/31/2028                                                                                                                                                                                                 |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 65 families are expected to benefit from the rental units constructed from this activity                                                                                                                   |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                            |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                            |
| 2 | <b>Project Name</b>                                                                            | CHDO Reserve Project                                                                                                                                                                                       |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                            |
|   | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                            |
|   | <b>Needs Addressed</b>                                                                         | Affordable Rental Housing<br>Affordable Homeownership Opportunities                                                                                                                                        |
|   | <b>Funding</b>                                                                                 | HOME: \$133,787.48                                                                                                                                                                                         |
|   | <b>Description</b>                                                                             | Franklin County will work with local CHDO(s) to develop affordable housing. Prioritizing shovel-ready projects, we will work with CHDOs to develop new or rehabilitated housing (rental and homeownership) |
|   | <b>Target Date</b>                                                                             |                                                                                                                                                                                                            |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | Activities under this project may include support for 2 homeownership units or up to 4 HOME assisted rental units.                                                                                         |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                            |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                            |
| 3 | <b>Project Name</b>                                                                            | CDBG Public Services Projects                                                                                                                                                                              |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                            |
|   | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                            |

|   |                                                                                                |                                                                                                                                                                                                                                                    |
|---|------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | <b>Needs Addressed</b>                                                                         | Public Services                                                                                                                                                                                                                                    |
|   | <b>Funding</b>                                                                                 | CDBG: \$329,955.75                                                                                                                                                                                                                                 |
|   | <b>Description</b>                                                                             | Franklin county will use its 15% public services amount according to a competitive award process. 2025 projects included homeless outreach and emergency shelter, homeownership counseling, nutrition support, youth programs, and other services. |
|   | <b>Target Date</b>                                                                             | 12/31/2027                                                                                                                                                                                                                                         |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                                                                                                                                    |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                                    |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                                    |
|   |                                                                                                |                                                                                                                                                                                                                                                    |
| 4 | <b>Project Name</b>                                                                            | Owner Occupied Home Repair                                                                                                                                                                                                                         |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                                    |
|   | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                                                                    |
|   | <b>Needs Addressed</b>                                                                         | Affordable Homeownership Opportunities                                                                                                                                                                                                             |
|   | <b>Funding</b>                                                                                 | CDBG: \$769,896.75                                                                                                                                                                                                                                 |
|   | <b>Description</b>                                                                             | Home repair for income eligible low- and moderate-income homeowners.                                                                                                                                                                               |
|   | <b>Target Date</b>                                                                             | 12/31/2027                                                                                                                                                                                                                                         |
|   | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 60 low to moderate income families will benefit from this activity                                                                                                                                                                                 |
|   | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                                    |
|   | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                                    |
| 5 | <b>Project Name</b>                                                                            | Down Payment Assistance                                                                                                                                                                                                                            |
|   | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                                    |
|   | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                                                                    |
|   | <b>Needs Addressed</b>                                                                         | Affordable Homeownership Opportunities                                                                                                                                                                                                             |
|   | <b>Funding</b>                                                                                 | CDBG: \$219,970.50                                                                                                                                                                                                                                 |

|          |                                                                                                |                                                                                                                                                                                                                           |
|----------|------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | <b>Description</b>                                                                             | This project will provide down payment assistance to low-income residents of Franklin County.                                                                                                                             |
|          | <b>Target Date</b>                                                                             | 12/31/2027                                                                                                                                                                                                                |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | This project will serve 5-7 households, depending on their level of need.                                                                                                                                                 |
|          | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                           |
|          | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                           |
| <b>6</b> | <b>Project Name</b>                                                                            | Microenterprise Technical Assistance                                                                                                                                                                                      |
|          | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                           |
|          | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                                           |
|          | <b>Needs Addressed</b>                                                                         | Economic Development                                                                                                                                                                                                      |
|          | <b>Funding</b>                                                                                 | CDBG: \$439,941.00                                                                                                                                                                                                        |
|          | <b>Description</b>                                                                             | This project will provide support for new LMI business owners to support economic development in Franklin County. Project activities may include coaching, workshops, microlending, or other business support activities. |
|          | <b>Target Date</b>                                                                             | 12/31/2027                                                                                                                                                                                                                |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> | 150 businesses will benefit                                                                                                                                                                                               |
|          | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                           |
|          | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                           |
| <b>7</b> | <b>Project Name</b>                                                                            | Homelessness Prevention and Services                                                                                                                                                                                      |
|          | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                           |
|          | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                                           |
|          | <b>Needs Addressed</b>                                                                         | Homelessness Prevention and Services                                                                                                                                                                                      |
|          | <b>Funding</b>                                                                                 | ESG: \$178,113.00                                                                                                                                                                                                         |

|          |                                                                                                |                                                                                                                                                                                                                                                                                                       |
|----------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|          | <b>Description</b>                                                                             | The project will provide funds to our CoC partner Community Shelter Board for Homelessness Prevention Services, including emergency shelter, homeless outreach, and other homelessness prevention and services for the homeless population, supports shelter operations and expenses related to HMIS. |
|          | <b>Target Date</b>                                                                             | 12/31/2027                                                                                                                                                                                                                                                                                            |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                                                                                                                                                                                       |
|          | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                                                                                       |
|          | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                                                                                       |
| <b>8</b> | <b>Project Name</b>                                                                            | EDP Planning and Administration                                                                                                                                                                                                                                                                       |
|          | <b>Target Area</b>                                                                             |                                                                                                                                                                                                                                                                                                       |
|          | <b>Goals Supported</b>                                                                         |                                                                                                                                                                                                                                                                                                       |
|          | <b>Needs Addressed</b>                                                                         | Planning and Administration                                                                                                                                                                                                                                                                           |
|          | <b>Funding</b>                                                                                 | CDBG: \$439,941.00<br>HOME: \$199,854.44                                                                                                                                                                                                                                                              |
|          | <b>Description</b>                                                                             | Planning and administration activities related to the CDBG and HOME programs.                                                                                                                                                                                                                         |
|          | <b>Target Date</b>                                                                             | 12/31/2027                                                                                                                                                                                                                                                                                            |
|          | <b>Estimate the number and type of families that will benefit from the proposed activities</b> |                                                                                                                                                                                                                                                                                                       |
|          | <b>Location Description</b>                                                                    |                                                                                                                                                                                                                                                                                                       |
|          | <b>Planned Activities</b>                                                                      |                                                                                                                                                                                                                                                                                                       |

## **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**

Areas served will include Franklin County, outside of the city of Columbus.

### **Geographic Distribution**

| <b>Target Area</b> | <b>Percentage of Funds</b> |
|--------------------|----------------------------|
| Countywide         |                            |

**Table 8 - Geographic Distribution**

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

#### **Discussion**

HUD CPD resources are provided to programs that operate county-wide as well as in specific geographic areas. The Housing rehabilitation programs operate throughout the county.



## Affordable Housing

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

#### Introduction

Franklin County invests federal funds in the development of rental and homeowner units, the rehabilitation and repair of existing homeowner units, and the provision of supportive services and emergency shelter benefiting low- and moderate-income households. This section shows specific goals for the number of homeless, non-homeless, and special needs households that will be provided affordable housing during the 2026 program year. Also shown is the number of affordable housing units that will be provided with CDBG and HOME funds.

| One Year Goals for the Number of Households to be Supported |     |
|-------------------------------------------------------------|-----|
| Homeless                                                    | 0   |
| Non-Homeless                                                | 134 |
| Special-Needs                                               | 0   |
| Total                                                       | 134 |

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

| One Year Goals for the Number of Households Supported Through |     |
|---------------------------------------------------------------|-----|
| Rental Assistance                                             | 0   |
| The Production of New Units                                   | 74  |
| Rehab of Existing Units                                       | 60  |
| Acquisition of Existing Units                                 | 0   |
| Total                                                         | 134 |

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

#### Discussion

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

### **Introduction**

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

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

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

CMHA is not a troubled PHA.

### **Discussion**

See above

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

### **Introduction**

The lead agency for the homeless service system in Columbus is the Community Shelter Board (CSB), an independent non-profit agency founded in 1986 by a group of civic leaders, business associations, local government leaders and representatives from a variety of foundations. CSB does not provide any direct services to the community. Its main responsibilities are resource development and investment, service delivery coordination and planning, fostering collaboration, program accountability, and public policy reform. The CSB allocates funding annually to partner agencies for programs serving homeless individuals and families in Columbus. The CSB receives funding from many and varied sources such as the Franklin County, the City of Columbus, Federal funds, Ohio Department of Development, United Way, Together Rebuilding Lives, and private and corporate donations.

### **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 County, in partnership with the Community Shelter Board, has created a unified system to better respond to homeless persons who are not accessing shelter, including a coordinated call and dispatch system, common documentation and shared outcomes for the street and camp outreach program. The Maryhaven Collaborative Outreach Team is improving access to resources for adults living on the streets, reducing the number of adults experiencing long-term street homelessness; reducing frustration for the community trying to help homeless people and is more efficiently deploying resources to reduce duplication of efforts in Columbus and Franklin County. The County's subgrant of ESG funds to the CSB to address the needs of persons experiencing homelessness in Franklin County.

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

The Consolidated Plan Homeless Strategy revolves around two target groups: 1) homeless households (individuals and families with children) who have a disabled member and have experienced long-term homelessness and 2) homeless households without a disabled member who have experienced short-term homelessness, as well as households at-risk of homelessness. Strategies for both of these groups involve the prevention of homelessness and, if homelessness occurs, the provision of shelter, transitional housing, permanent housing and supportive services for those in need. The lead agency for the homeless service system in Columbus is the Community Shelter Board (CSB). The CSB provides access to shelter beds for men, women, and families in Columbus and Franklin County. Beyond providing a secure and clean place to sleep, all programs provide access to basic services such as showers, meals, healthcare, and material assistance as well as referrals, supportive services and crisis assistance. Most shelters have resource centers that provide internet access, telephones, employment leads, job training

resources and other community resources as well as support staff to assist individuals in obtaining jobs and housing.

**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**

In partnership with the Community Shelter Board, the county has created a unified system for permanent supportive housing. The Unified Supportive Housing System (USHS) includes a centralized eligibility determination and placement, periodic review of tenant needs and "move up" incentives to encourage tenants to be more independent. Fewer adults and families will experience long-term homelessness. Additionally, there are more housing units available, easier access to supportive housing for prospective tenants, one application process and improved targeting of scarce housing resources. People with the greatest needs receive priority for housing.

**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 Community Shelter Board coordinates prevention and shelter diversion programs to assist families and individuals who are homeless, precariously housed, or living on the streets, to locate and maintain stable housing. Families and individuals are provided with relocation services, referrals, tenant education and linkage to short-term financial rental assistance to quickly resolve the family or individual housing crisis.

## **Discussion**

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

### **Introduction:**

Franklin County does not have enough affordable housing to meet its residents current needs, and the private market is not producing a high volume of affordable rental housing. As discussed in the Consolidated Plan, there are many barriers to providing affordable housing. A number of market characteristics impact the production of new units, including: the large growth of population in Columbus; increased demand for rental housing units; rising rental and homeownership costs; the recovery of the housing market; the production of new housing units by the private market; current housing affordability; demolition of public housing units; the number of people on the Section 8 waiting list; and the cost of land and development. Neighborhoods continue to seek the highest possible quality and amenities for housing developed in their communities and this tends to increase costs and make housing units less affordable to those seeking to live in these areas. The process of obtaining plan approval and building permits requires the use of paid professionals such as architects, engineers, and spec writers to address building issues. Additionally, state code and newly developed pro-active code enforcement raises the bar for property maintenance requirements which can be a challenge for the elderly and disabled. As mentioned above, the Columbus Metropolitan Housing Authority has reduced the number of public housing units in the community.

**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**

See attachment labeled “Additional Characters”

### **Discussion:**

Franklin County will coordinate with community development organizations that have shown the capacity and neighborhood buy-in to bring housing developments to fruition. The county will look to these partners to help overcome barriers to affordable housing through such incremental steps as educating the public and civic leaders about affordable housing, advocating for transportation options in all areas of the county and working together to attract additional subsidy to overcome high cost of housing redevelopment over the long term.

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

### **Introduction:**

Described below are the county's planned actions to carry out the following strategies outlined in the Annual Action Plan

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

See attachment labeled "Additional Characters"

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

See attachment labeled "Additional Characters"

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

See attachment labeled "Additional Characters"

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

See attachment labeled "Additional Characters"

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

See attachment labeled "Additional Characters"

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

See attachment labeled "Additional Characters"

### **Discussion:**

See above

## Program Specific Requirements

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

#### Introduction:

The following are the program specific requirements for the Annual Action Plan.

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

##### Reference 24 CFR 91.220(l)(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% |

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(l)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

as follows:

No other forms are utilized.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

See attachment labeled "Additional Characters"

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

See attachment labeled "Additional Characters"

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

EDP does not anticipate refinancing existing debt in this manner.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

We have not allocated any 2026 funds to TBRA.

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

We have not allocated any 2026 funds to TBRA.

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

NA



**Emergency Solutions Grant (ESG)**  
**Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

NA

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

See attachment labeled "Additional Characters"

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

NA

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

NA

5. Describe performance standards for evaluating ESG.

See attachment labeled "Additional Characters"

## **Attachment: Additional Characters**

**This attachment will be used to provide additional character space that exceeds IDIS' 4,000-character limit.**

### **- AP-05 Executive Summary**

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

- Public participation is an essential part of the consolidated planning process because it helps ensure that decisions are made with careful attention to community needs and preferences. Moreover, the input of stakeholder and community members generates additional public awareness about the consolidated planning process. Involvement allows more perspectives to be featured during the decision-making process, which gives Franklin County more information to consider in the development of the Consolidated Plan priorities and goals. Receiving input and buy-in from planning officials, stakeholders, and residents of Franklin County plays a significant role in helping the plan take shape.
- To this end, a public involvement process was developed to gather targeted feedback from stakeholder groups and provide opportunities for all community residents to participate in the planning process. The major activities of the public involvement process included the provision of a technical assistance workshop, multiple public hearings, a public comment period during which the draft plan could be reviewed, and the ongoing provision of staff support.
- Citizen participation specifically solicited for the 2026 Action Plan was compiled through various efforts including publishing public notices, publishing the draft plan on the Franklin County Economic Development and Planning Department's website, and emailing the draft Action Plan to numerous non-profits, government agencies, and participating jurisdictions.

### **- AP-10 Consultation**

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

- Franklin County EDP attends community engagement events to bolster its relationship between housing providers and the aforementioned agencies, by explaining to citizens services provided by both entities and how to access those resources. Additionally, we post information on our websites to coincide with the information we provide. Franklin County has also created and executed a "one-stop-shop" at the courthouse, which has representation from all Health and Human Resource Agencies, including ADAMH, Franklin County Public Health, Job & Family Services, Office on Aging, etc., which is free and accessible to all Franklin County residents. The Franklin County Board of Commissioners oversees 14 county agencies to provide resources to Franklin County residents. Economic Development and Planning (EDP) is the agency who directly administers HUD

entitlement funding. In addition to administering this funding, EDP also oversees the County's residential building department, economic development, planning and zoning, GIS, and code enforcement. As such, EDP is the floodplain management office for the county and there is no other agency to consult with on this topic. Franklin county's disaster recovery services are managed by Franklin 3County Emergency Management and Homeland Security. This agency does not have its own planning staff, so EDP provides planning services for disaster mitigation and disaster recovery planning. In addition to this planning effort, EDP and Franklin County Emergency Management and Homeland Security senior leadership meet weekly every Wednesday morning to coordinate department efforts. Franklin County's Data Center is an integral part of the Franklin County Digital Equity Coalition. The data center is housed in the county's Office of Budget and Management, under the same governmental entity (the Board of Commissioners (BOC) as EDP. EDP and Data Center staff meet weekly every Wednesday morning to coordinate department efforts on identifying and addressing community needs across all BOC agencies. The data center also meets biweekly with EDP's GIS team to coordinate on technology needs in the community. OMB and the data center are consulted annually as EDP compiles its action plan and annual budget. EDP staff also sit on several MORPC committees related to sustainability planning and protecting natural resources.

○ **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 County has representatives on the Continuum of Care (CoC) for Franklin County and the City of Columbus. The local CoC is known as the Rebuilding Lives Funder Collaborative (RLFC) which is staffed by the Community Shelter Board (CSB). Funding, monitoring, and system changes are discussed and determined by the RLFC (CoC). The County provides local general fund and Capital Improvement Bond funds in addition to federal ESG and HOME dollars to CSB as an intermediary agency to fund local nonprofit providers working to prevent homelessness and providing emergency shelter. Efforts also include and encourage initiatives of rapid re-housing and stabilization for individuals and families experiencing homelessness. Additionally, funds can also be used to support the community's Homeless Management Information System (HMIS) to guarantee that the community's plan to end homelessness is based on the most applicable and current homeless data available. The County also provides local Capital Improvement Bond funds and federal HOME funds to assist in the development of permanent supportive housing for chronically homeless individuals and families. CSB, along with its partner agencies, is designing and implementing a transformational new system designed to move single adults more quickly into stable housing, stop repeat homelessness, and add more capacity when overflow demands are high to make sure everyone who needs shelter is able to get it. There are three key components: First, a new emergency shelter will address the

growing numbers of men, women and families who are experiencing homelessness, so no one has to sleep on the streets in Columbus. Second, case managers called Navigators will link with a person when they enter the homeless system and work with them throughout their stay. Third, relationships with key partner agencies will be strengthened and enhanced.

- **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**
  - In Columbus and Franklin County the Continuum of Care (CoC) role and responsibilities is carried out by a committee made up of representatives from the City, County, Community Shelter Board, and other local nonprofits. The CoC committee provides funding for the capital, services, and operations of supportive housing in Columbus and Franklin County; coordinates activities for the new plan; promotes collaboration to achieve goals and strategies; and secures resources for programs and projects. The County has ongoing membership, representation, and participation in this committee.

(CoC) Planning:

- Receive community and public policy updates relevant to homelessness issues
- Plan and conduct a sheltered and unsheltered point-in-time count of homeless persons (delegated to CSB)
- Conduct an annual gaps analysis of the homeless needs and services (delegated to CSB)
- Provide required information to complete the local Consolidated Plan(s) (delegated to CSB)
- Review and act on the annual funding allocations, inclusive of ESG and CoC funds, and establish funding priorities
- Review and act on the HUD CoC Application including all relevant charts and tables
- Review and act on any programs that should be removed from HUD funding and any proposed funding reallocations
- Review and make final determination on provider appeals
- Review and act annually on the proposed new supportive housing bonus project
- Designate a Collaborative Applicant

HMIS Operations:

- Designate a single HMIS for the CoC
- Designate an HMIS Lead

- Ensure consistent participation in HMIS (delegated to CSB)
- Ensure the HMIS compliance with HUD requirements (delegated to CSB)
- Review and approve the HMIS policies and procedures, privacy plan, security plan and data quality plan (delegated to CSB)

- **AP-15 Expected Resources**

- **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 creation and maintenance of affordable housing requires the use of both government and private financing and the encouragement of cooperation between the private non-profit, for-profit and the public sector. To the greatest extent practicable, available federal, state and local public and private sector resources are leveraged to generate the maximum benefit from housing activities. The Affordable Housing Trust for Columbus and Franklin County invests in HOME-eligible county projects. These funds are local dollars dedicated to the development of affordable housing. CDBG funds are often utilized to aid with business growth and development. There are many allowable uses of the funds including payroll assistance, working capital, purchase of equipment and machinery and renovation of an existing business. Federal funds, provided through a loan or grant, are used to leverage other financial sources and fully fund the project. This additional funding may be provided by the business owner or other public and private partners that may include other funding sources including County, the State of Ohio or other financial institutions. Each year the county is required to provide a 25% match for all HOME grant expenditures. The County fulfills the HUD Cash Match requirement by providing a 25 percent cash match for every HOME dollar it expends. This match goes towards affordable housing and is matched by a non-federal source. In 2026, the County has identified \$352,898 as its federal cash match amount. The match is easily met by virtue of the County's annual allocation to the Rebuilding Lives effort. For a more detailed account of how Franklin County leverages federal funds, please see the discussion section below.
  - Similarly, to the greatest extent practicable, available federal, state and local public and private sector resources are leveraged to generate the maximum benefit from Emergency Solutions Grant allocations. Local and private funds are used to match at least 100% of ESG funds expended to satisfy match requirements at 24 CFR 576.201. During the 2026 program year, County Real Estate Transfer Funds (RETF), County General Fund, and private contributions will be used to match at least 100% of the ESG allocation.

- **AP-75 Action Plan Barriers to Affordable Housing**

- **Introduction**
  - Franklin County does not have enough affordable housing to meet current needs and the private market is not producing a high volume of affordable

rental housing. As discussed in the Consolidated Plan, there are many barriers to providing affordable housing. A number of market characteristics impact the production of new units, including: the large growth of population in Columbus; increased demand for rental housing units; rising rental and homeownership costs; the recovery of the housing market; the production of new housing units by the private market; current housing affordability; demolition of public housing units; the number of people on the Section 8 waiting list; and the cost of land and development. Neighborhoods continue to seek the highest possible quality and amenities for housing developed in their communities and this tends to increase costs and make housing units less affordable to those seeking to live in these areas. The process of obtaining plan approval and building permits requires the use of paid professionals such as architects, engineers, and spec writers to address building issues. Additionally, state code and newly developed pro-active code enforcement raises the bar for property maintenance requirements which can be a challenge for the elderly and disabled. As mentioned above, the Columbus Metropolitan Housing Authority has reduced the number of public housing units in the community.

- **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 Economic Development & Planning Department continues to implement recommendations from the Columbus & Franklin County Housing Task Force to provide property tax incentives, increase housing code enforcement and expansion of the county and city Land Banks. The Land Bank Program of the Land Redevelopment Office will partner with Code Enforcement to identify, and if possible, acquire vacant tax delinquent properties to expedite their return to productive use. The County provides housing rehabilitation programs to assist these populations with maintaining code compliance.
  - General ideas to overcome barriers:
    - Link non-profit agencies with for-profit developers and expanding density levels
    - Target areas based on public infrastructure, transportation, and job centers
    - Maximize the use of subsidies for low-income households
    - Public infrastructure improvements in affordable housing areas
    - Remove density restrictions in neighborhoods
    - Allow ancillary housing on already developed lots
    - The City of Columbus utilizes a HOME funds to invest in communities housing stock. The City also uses Affordable Housing Bond funds to invest in affordable housing unit construction. The City follows strict community input processes in advance of land use and zoning changes for affordable housing project. Although this sometimes can be so

involved that the projects are delayed, it is important that the neighbors of the new developments are allowed sufficient opportunity to comment on development plans.

- The County is strategically investing in community transit options and transit-oriented development planning. This is also true for the City of Columbus and the Central Ohio Transit Authority, the public institution which serves as the public transportation provider for the County and City. Building affordable housing on or near quality public transportation is a priority for the County funded by way of the magnet fund. Additionally, the County continues to invest general funds in code enforcement and eviction prevention programs. Recently, the County has removed eviction records for all Franklin County residents that were five years or older.
- **Discussion:**
  - Franklin County will coordinate with community development organizations that have shown the capacity and neighborhood buy-in to bring housing developments to fruition. The county will look to these partners to help overcome barriers to affordable housing through such incremental steps as educating the public and civic leaders about affordable housing, advocating for transportation options in all areas of the county and working together to attract additional subsidy to overcome high cost of housing redevelopment over the long term.

## - **AP-85 Other Actions**

- **Actions planned to address obstacles to meeting underserved needs:**
  - A key underserved group in Franklin County are individuals with special needs, particularly those living with a disability. Low funding levels are consistently cited as the reason for the shortage of services. The County attempts to secure additional funds through its housing rehab programs that place a no interest loan on home that is not payable until the homeowner sales of vacates their property. In addition, the County funds a Senior and Disable housing repair program through the Economic & Community Development Institute. Further, all County rental programs require tenants to be at or below 80% AMI. County homebuyer programs continue outreach with lenders including on-site training and outreach at homebuyer education classes (Including pre and post counseling). All rental programs require tenants to be at or below 80 percent AMI. City homebuyer programs continue outreach with lenders including on-site training and outreach at homebuyer education classes. The funding of supportive services to provide ongoing housing case management services will include the development of updated, comprehensive housing plans implemented in a timely and consistent manner. The Franklin County Board of Commissioners oversee 14 county agencies to provide resources to Franklin County residents. Economic Development and Planning (EDP) is the agency who directly administers HUD entitlement funding. In addition to administering this funding, EDP also oversees the county's residential building department, economic development, planning and zoning, GIS, and code enforcement. As such, EDP is the floodplain management office for the county and there is no other agency to consult with on this topic. Franklin county's disaster recovery

services are managed by Franklin County emergency management and Homeland security. This agency does not have its own planning staff, so EDP provides planning services for disaster mitigation and disaster recovery planning. In addition to this planning effort, EDP and Franklin County emergency management and Homeland security senior leadership meet weekly every Wednesday morning to coordinate department efforts. Franklin County's Data Center is an integral part of the Franklin County digital equity coalition. The data center is housed in the County's Office of Budget and Management, under the same governmental entity (the Board of Commissioners (BOC)) as EDP. EDP and Data Center staff meet weekly every Wednesday morning to coordinate department efforts on identifying and addressing community needs across all BOC agencies. The data center also meets biweekly with EDP's GIS team to coordinate on technology needs in the community. OMB and the data center are consulted annually as EDP compiles its action plan and annual budget. Digital Equity is the Franklin County planning agency working to increase broadband access throughout Franklin County. The action plan is located via the link below: <https://franklincountydigitalequity.org/>. EDP staff also sit on a number of MORPC committees related to sustainability planning and protecting natural resources.

○ **Actions planned to foster and maintain affordable housing:**

- Coordinated goals for the County include:
  - Support the development of multi-family housing with low-income housing tax credits.
  - Continue to fund owner-occupied repair/rehab through loans to persons earning 80 percent or less LMI.
  - Combine transit lines and housing projects through the magnet fund.
- The County's HOME program prioritizes the redevelopment of existing affordable housing rental units. New units are added to the inventory through this program. The city bond-funded Rental Rehabilitation Program, which focuses on smaller rental units also adds units to the total inventory. HUD-approved homeowner counseling agencies assist with foreclosure prevention and pre-purchase counseling.

○ **Actions planned to reduce lead-based paint hazards:**

- The County allocates CDBG funds to housing repair programs that utilize lead hazard standards and abatement.

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

- Addressing poverty is one of the County's most important functions. This was demonstrated through the County's adoption of the Eliminating Poverty Blueprint. In partnership with other governmental bodies, non-profits, businesses, institutions and local foundations, the County is working to employ the following goals and strategies:
  - Initiating workforce development programs coordinating businesses with local curriculums.
  - Linking transportation such as bus service to job sectors
  - Creating jobs and through local incentives
  - Provide sufficient housing which working families can afford.
- Programs funded with CDBG and HOME funds provide homeowner and rental rehabilitation and repairs, new construction of rental and homeowner units and



downpayment assistance for income-eligible, first-time homebuyers. These activities, that produce and preserve affordable housing, are important in reducing the number of poverty-level families in the county. Using CDBG funding, county programs also support activities that provide child care and recreational activities, health care programs that provide education and training for low-income individuals, and economic development programs that require the creation of jobs. Using general fund dollars, the county provides funding for anti-poverty activities such as literacy and job training.

- The county implements the federally required Section 3 program which is intended to ensure that when employment or contracting opportunities are generated by HUD funded Section 3 covered projects, preference is given to qualified low and very low-income persons or business concerns (implementing the new HUD section 3 guidelines.)
- **Actions planned to develop institutional structure:**
  - The County is restructuring its use of CDBG and HOME funds during the 2024 program year. This restructuring will identify eligible applicants and the process for soliciting and funding applications or proposals. Detailed information will be available on the County's Website. EDP does not currently have a process for identifying eligible applicants due to not having the capacity to fully administer the program. In six months, we plan to have a new process completely fleshed out so that we can submit an amendment to the AAP.
  - <https://development.franklincountyohio.gov/>
- **Actions planned to enhance coordination between public and private housing and social service agencies:**
  - There are a number of ongoing collaborative efforts in the community. Guided by the Community Shelter Board, the city, county, and other entities participate in efforts to address and end homelessness through the A Place to Call Home. The Community Development Collaborative is funded by the city, county, and other private organizations to provide operating support and technical assistance to Community Development Corporations. The Columbus Affordable Housing Task Force which consists of HUD, state and local government staff and development organizations meets every quarter to discuss affordable rental projects and preservation opportunities. There is an ongoing collaboration with the Columbus Metropolitan Housing Authority regarding development opportunities, use of project-based vouchers and other related issues. The Housing Dialogue group brings practitioners and academics from The Ohio State University, Knowlton School of Architecture, to look at housing issues from different perspectives. Additionally, a group of local non-profit organizations has formed the Housing Alliance to make a case for affordable housing and need for resources in the community.

## AP-90 Program Specific Requirements

- **HOME Investment Partnership Program (HOME)**
  - **2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

**From our HOME Homebuyer Policy Adopted 11/17/2025:**

## Recapture Guidelines for HOME Homebuyer Programs

Per 24 CFR 92.150, Franklin County adheres to the following recapture guidelines (as opposed to the resale option) in the operation of its HOME funded homeownership programs. These guidelines are to be adhered to for all homeownership programs administered by the County or any designee including Subrecipients and Community Housing Development Organizations (CHDOs) designated by the County. All buyers sign a HOME Homebuyer Agreement with the PJ in addition to a note and mortgage. The Homebuyer Agreement outlines, among other provisions, the required HOME Period of Affordability, recapture provisions triggered by a sale or other transfer of title, and requirements for continued occupancy of the home. Depending on the level of direct homeownership assistance provided to the buyer, the formal HOME Period of Affordability is:

- Five (5) years if buyer assistance is less than \$25,000;
- Ten (10) years if buyer assistance is \$25,000 or more but less than \$50,000; or
- Fifteen (15) years if buyer assistance is \$50,000 or more.

The guidelines are based on 24 CFR 92.254 (a)(4)(ii), which stipulates the conditions for recapture of the HOME investment used to assist low-income families in acquiring a home. Two factors that are important in developing the guidelines are the fair return to the buyer at time of sale, as well as insuring that the homeowner is not put in a negative equity position.

It is also important to realize that there are two forms of subsidy; a subsidy on the development cost of a project which brings the total project cost down to the market value of the house to be sold, and a subsidy to the homebuyer that lowers the cost of the house from market value to a price affordable by the buyer. These factors along with other policies determine the amount of HOME funds to be recaptured.

Given these considerations, the amount of HOME funds to be recaptured will be equal to the difference between the appraised value of the house and the price paid by the buyer, not to exceed the total amount of HOME funds in the project. This amount would become the HOME second mortgage. The balances of HOME funds in the project, if any, are deemed to have been a development subsidy and will not be recaptured.

HOME assistance to a buyer is provided in the form of a *forgivable deferred loan*, held in the name of the PJ, secured by a subordinate mortgage which is due and payable upon sale or transfer of title within the Period of Affordability. The HOME loan carries no interest and does not require monthly payments.

The “Period of Affordability” is a compliance requirement under the HOME program’s regulations. It is not necessarily the same as the term of the HOME loan provided to an assisted buyer. Under Franklin

County's approach, however, the term of the HOME loan and the Period of Affordability run concurrently and end at the same time.

While uncommon, an assisted buyer may choose to voluntarily prepay the HOME loan, in whole or in part, at any time. However, prepayment does not end the HOME Period of Affordability or cancel the Homebuyer Agreement which will continue to apply and, among other things, require the home remain the assisted-buyer's principal residence. Upon expiration of the Period of Affordability, any balance on the HOME loan will be forgiven if the buyer has otherwise complied with all program requirements.

In the event of a sale or transfer of title **during** the Period of Affordability, the HOME loan becomes due and payable. Provided the assisted buyer has complied with the terms of the Homebuyer Agreement (e.g., has maintained the home as their principal residence), a portion of the original principal balance will be forgiven on a prorated basis for each full year of the Period of Affordability completed as shown in the formula below.

- $\text{Forgiven at Sale} = \text{Original HOME Assistance} \times (\text{Years Completed} \div \text{Period of Affordability})$

For example, if the Period of Affordability is 10 years and the assisted buyer sells after the third (3rd) anniversary of the beginning of the Period of Affordability but before completing four (4) years, 30% of the original HOME loan (3 completed years  $\div$  10-year period) will be forgiven.

*Example: the Brown family purchases a \$250,000 house through the PJ's Homebuyer Assistance Program. The PJ provides \$30,000 in homeownership assistance to the Browns helping to cover their down payment, closing costs, and reducing the first mortgage to \$225,000 (based on their payment ability). After seven (7) years, the Brown family decides to sell their home. Because the Browns have completed seven (7) complete years of the 10-year Period of Affordability, the PJ forgives 70% of the original balance (\$21,000) leaving an outstanding balance of \$9,000, which the PJ recaptures.*

- $\$30,000 \text{ Original HOME Assistance} \times (7 \text{ Years} \div 10\text{-year Period of Affordability}) = \$21,000$   
*Forgiven at Sale*

However, under HOME regulations, recapture due from an assisted buyer's sale or other transfer of title (including via foreclosure) is limited to the "net proceeds of sale." This ensures that buyers are not "upside down" on their HOME loan. The net proceeds of sale are defined as the sales price (that is the price at which the original buyer is now selling the home) less the sum of the assisted buyer's senior secured debt (e.g., their first mortgage) and reasonable seller's closing costs (e.g., realtor fee, transfer taxes, etc.) as shown in the formula below:

$\text{Net Proceeds} = \text{Sales Price} - (\text{Payoff of Senior Loan} + \text{Seller Closing Costs})$   
 $\$250,000 \text{ Sales Price} - (\$221,000 \text{ Senior Payoff} + \$15,000 \text{ Seller Closing Costs}) = \$14,000 \text{ Net Proceeds}$

In the event the net proceeds are less than the outstanding HOME loan balance, the PJ reserves the right to determine whether the sales price is representative of an arms-length transaction for a similar unit and to evaluate the closing costs being charged to the assisted buyer (now the seller) to ensure they are reasonable and customary. Assuming there are no irregularities, the net proceeds of sale will be accepted as full and final payoff of the HOME loan.

*Example: Assume the Brown family from the example above sells their house after only 18 months. The Browns completed one (1) full year of the 10-year Period of Affordability, so the initial calculation of the HOME loan balance would be \$27,000 (with 10%, or \$3,000, having been forgiven).*

However, the home's value has not increased, and the Browns sell for the same \$250,000 price as they purchased the home. After paying the first mortgage balance of \$221,000 (only \$4,000 of principal was repaid over this period) and the Browns' seller closing costs of \$15,000 (assuming +/-6% of the sales price). There is only \$14,000 in net proceeds available.

While the outstanding balance of the HOME loan is nominally \$27,000, the PJ would only recapture the net proceeds of \$14,000. The remaining (or excess) \$13,000 balance of the HOME loan would be cancelled. While there are no remaining proceeds available to the Brown family, the family is not "upside down" with an unpaid outstanding balance on the HOME loan.

Consistent with HOME regulations, the PJ records payments received as a result of a sale or transfer within the Period of Affordability as "recaptured funds." While not expected, any voluntary prepayments within the Period of Affordability are recorded as "program income."

- **Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

- On a case-by-case basis, the county may use HOME funds to refinance existing debt in connection with the rehabilitation of multifamily housing. Eligible properties may be located anywhere in the county. Under no circumstances will HOME funds be used to refinance multifamily loans made or insured by any Federal program, including CDBG. In addition, the guidelines established by the county require that 1) the multifamily housing undergoing rehabilitation and refinancing is necessary to continue to provide affordable housing to low income families, 2) rehabilitation must be the primary eligible activity for which at least 60 percent of the HOME funds are used, 3) eligible projects must require a minimum level of rehabilitation of \$10,000 per unit, 4) a maximum of 40 percent of HOME funds may be used for the refinancing of existing debt, 5) the use of HOME funds must be conditioned upon a low income affordability period of a minimum of 15 years, and 6) the county must review the management practices of the property owner to insure that disinvestment has not occurred, that the long term needs of the project can be met and that the feasibility of serving the targeted population over at least a 15 year affordability period can be demonstrated.

- **Emergency Solutions Grant (ESG)**

- **2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system:**

- Community Shelter Board implemented the Coordinated Point of Access (CPoA) for single adults attempting to obtain shelter. CPoA has specialists available 24 hours a day, 7 days a week to conduct a preliminary triage and assessment and to explore diversion possibilities via a prescribed set of diversion questions. Single adults determined to meet shelter eligibility criteria are then referred to the most appropriate shelter bed. Single adult shelters must coordinate services

through the CPoA with the exception of the shelter serving inebriated single adults who are receiving access directly through community services. Once in shelter, the individual's need is assessed using the community's Vulnerability Assessment, within the first five days of shelter stay. For the Family Shelter System, all families seeking shelter must contact the family front door, the YWCA Family Center (FC), to determine eligibility for shelter. The FC staff conducts diversion and triage to determine the best avenue for the family. If the family must be admitted into the FC, after a need assessment is completed, they will then be referred to the best rapid re-housing (RRH) program to address their needs. All families need to meet certain eligibility criteria for participation in RRH programs, but housing first principles are followed at all times. Both centralized systems are participating in the local HMIS and all intake information is collected into our open system, facilitating service provision.

- **5. Describe performance standards for evaluating ESG:**
  - Program performance standards are established by Community Shelter Board (CSB) and recommended to the Continuum of Care (CoC) Board for approval and incorporate HUD requirements and local standards. Program performance standards are reviewed annually by the CoC Board. CSB incorporates these standards into annual program agreements with each sub-recipient. An annual Program Outcome Plan (POP) is part of the agreement. The POP establishes individual program performance goals for all homeless programs, by type. If CSB and the sub-recipient disagree on the annual POP, the sub-recipient may appeal. CSB monitors program performance and provides monthly, quarterly, semi-annual, and annual community data reports. Each POP performance goal is assessed versus actual performance as achieved or not achieved. Achieved Goal is defined as 90% or better of a numerical goal or within 5 percentage points of a percentage goal, except where a lesser or greater value than this variance also indicates an achieved goal, or if the metric is fixed.